Exhibit A

From: Sent: To: Cc: Subject: Attachments:	Saturday, October 21, 2017 8:44 PM McGlashan McGlashan, Bill; ACT decision DecisionNotificationDocument1859150100165200001.pdf.pdf
Hi You are all set for double tim	e and a computer for ACT. So glad it worked out!
least 4 weeks before any test	tions, you must be proctored at school so you have to notify (cc:ed here) at that you register to take so she can set up a proctor for you. Are you planning to take the d for? Either way, please email me and asap to let us know your plans.
Have a great Sunday. Best,	



Decision Notification

10/21/2017



TAA Personal Identification Number (PIN):



Your request for accommodations and/or English learner (EL) supports has been reviewed. This notification is your record of the decisions that were made. Please work with the test coordinator at your school to resolve any questions you may have, or if applicable, to submit a request for reconsideration.

Accommodations/EL Supports Approved

The following accommodations and/or EL supports are approved.

- Computer (Essay or short answer for Paper Testing only)
- TC 2 Double Time (over multiple days)
- The approved accommodations are offered only through Special Testing. Testing materials will be shipped in advance of the three week Special testing window to the test coordinator or test accommodations coordinator at your school who submitted your request for accommodations. The three week Special testing window begins on the National test date that you are registered for. Testing may be scheduled on days and at times mutually agreed to by you and the test coordinator.
- The use of a computer is approved for the writing test only. Testing staff must certify that all tools such as spell check and grammar check are turned off on the word processing program. The examinee's essay must be printed in 12-point type on standard 8 1/2 x 11 paper with the following margins: 2 inches for the top margin and 1.5 inches for the bottom margin and 1 inch on both sides. The entire essay must be deleted from the computer.

This notification includes all requested accommodations and EL supports the examinee is eligible to receive. Not all of these accommodations and/or EL supports may be compatible and, thus, cannot be utilized together during the scheduled test administration (e.g. 50% extended time and double time). If you have questions about what accommodations and supports can be used together for the upcoming administration, please contact ACT at

No additional approved accommodations or EL supports are authorized. Testing with accommodations or EL supports that are not approved by ACT will result in a voided score for the examinee.

Exhibit B

From:

Monday, November 20, 2017 1:53 PM

Sent: To:

Rick Singer

Subject:

RE: The forms for

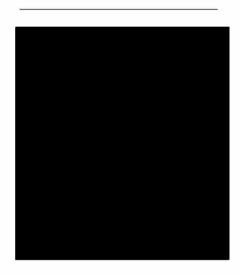
Attach:

0539 001.pdf

Hi Rick,

I help support Bill here at TPG. Please find the form attached. Let me know if you have any questions.

Thanks!



From: Rick Singer [mailto:

Sent: Monday, November 20, 2017 10:25 AM

To: McGlashan, Bill

Subject: The forms for

Bill the forms are attached. Please fill out the section for including his schools CEEB code. Then send back to me as a pdf file and I will forward to West Hollywood College Prep to fill in their portion.

Thanks

This message is intended only for the person(s) to which it is addressed and may contain privileged, confidential and/or insider information. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Any disclosure, copying, distribution, or the taking of any action concerning the contents of this message and any attachment(s) by anyone other than the named recipient(s) is strictly prohibited.

19-cr-10080-LTS Document 1066-1 Filed 04/08/20 Page 6 of 387

Request for Arranged Testing 2017–2018

General Information

- The test coordinator is responsible for completing this form.
- · Incomplete and/or unsigned forms will delay processing.
- · Faxed or emailed forms will not be accepted.
- Do not register online.

A. Examinee Information (print or type)



Name (Last, First, Middle Initial)		Title	
- Table (Easy)		1,50	
School Name (attach explanation if not the examinee's school)			
Street Address of School (required for shipping materials)		РО Вох	
City	State/Province	ZIP/Postal Code	Country
Email Address (required)		10 Digit Daytime Phone	Number

C. Testing Window (select one)

- Mark only one testing window.
- Send this request no later than the deadline for the selected testing window.
- Postmark deadlines are receipt deadlines for locations outside the US and Canada.

Testing Window	Postmark Deadline		
☐ September 9–October 1, 2017	August 4		
Cotober 28-November 19, 2017	September 22		
M December 9–31, 2017	November 3		
☐ February 10–March 4, 2018*	January 12		
☐ April 14–May 6, 2018	March 9		
☐ June 9–July 1, 2018	May 4		
☐ July 14–August 5, 2018*	June 15		

^{*}No test centers are scheduled in New York for the February and July test dates. February and July testing is available only in the United States, US Territories, Puerto Rico, or Canada.

D. Test Option (select one)

ACT (no writing)

X ACT with writing

E. Reason for Arranged Testing

Check one and include any required documentation.

- 1. (04) Religious faith prohibits Saturday testing and no non-Saturday test center established for any test date within 75 miles. Include a letter from a cleric (not a relative) or a notarized statement to verify the prohibition.
- 2. (05) No test center in the country for any test date.
- 3. (08) Within the United States or Canada only:
 No test center established for any test date within 75 miles
- 4. (10) Confined to a correctional institution from September 2017 through July 2018.

F. Test Coordinator's Statement

I certify that I have read and understand the Policies for ACT Arranged Testing. I further certify that I personally meet all requirements to be a test coordinator as specified in the Policies for ACT Arranged Testing and that I, or a member of my staff who also meets the same requirements, will administer the tests in accordance with the ACT Administration Manual sent with the test materials. I will ensure that the test materials are kept secure and confidential, used only for the examinee identified on this form, not transferred to another individual or location, and returned to ACT immediately after testing. I understand that by agreeing to be a test coordinator, I consent to the ACT Privacy Policy (www.act.org/privacy.html), which is incorporated into these Policies for ACT Arranged Testing by reference, including consent to the collection of my personally identifying information and its subsequent use and disclosure.

International Test Coordinators: By submitting this form, I am also providing my consent to ACT to transfer my personally identifying information to the United States to ACT or a third party service provider for processing, where it will be subject to use and disclosure under the laws of the United States. I acknowledge and agree that it may also be accessible to law enforcement and national security authorities in the United States.

Signature Date

G. Examinee Statement

I certify that I am the person whose information is submitted in accordance with the Policies for ACT Arranged Testing on this form and in the attached documentation, if any, and that the information provided is true and accurate to the best of my knowledge. I understand that by submitting this form, I consent to the ACT Privacy Policy (www.act.org/privacy.html), which is incorporated into these Policies for ACT Arranged Testing by reference, including consent to the collection of personally identifying information and its subsequent use and disclosure. Without limiting the above statement, I specifically authorize the release to ACT of diagnostic information by school officials, physicians, or others having such information, and full documentation, if requested. I understand that any documentation provided to ACT will remain with the application and will not become part of my examinee score record.

International Examinees: By submitting this form, I am also providing my consent to ACT to transfer my personally identifying information to the United States to ACT or a third party service provider for processing, where it will be subject to use and disclosure under the laws of the United States. I acknowledge and agree that it may also be accessible to law enforcement and national security authorities in the United States.

11-20-17

H. Fees

- Payments must be in the form of a check* or money order payable to ACT in US dollars and drawn on a United States or US affiliate bank.
- If eligible, examinees may pay with a fee waiver.

Description	Fee	Location(s)
ACT (no veriting)	\$46.00	Within the United States, US territories, Puerto Rico, or Canada
ACT (no writing)	\$93.50	All other locations
ACT with writing	\$62.50	Within the United States, US territories, Puerto Rico, or Canada
	\$110.00	All other locations
**Late Registration	\$29.50	Only available within the United States, US territories, Puerto Rico, or Canada
Test Date Change	\$26.00	All locations
Test Center Change	\$26.00	All locations

^{*}This is notification that when you pay by check you are authorizing ACT, Inc., to convert your check to an electronic entry. When we use this information from your check to make an electronic funds transfer, funds may be withdrawn from your account as soon as the same day you make your payment, and you will not receive your check back from your financial institution. If your check is returned to us due to insufficient or uncollected funds, it may be re-presented electronically and your account will be debited.

I. Return of Request Form.

Detach and mail this completed form, all required supporting documentation, and payment to:

ACT Arranged Testing 301 ACT Drive (PO Box 168) Iowa City, IA 52243-0168

^{**}If a Request is postmarked after the regular deadline but received before the late deadline, it will be processed for the preferred test date IF the late registration fee is included.

From: Sent: To: Subject: Attach:	Rick Singer Monday, November 20, 2017 4:43 PM Bill McGlashan Fwd: The forms for ACT_McGlashan.pdf; Untitled attachment 46532.htm
Bill the forms	are attached. Please send into ACT
Sent from my	iPhone
Begin forward	led message:
Date: N To: Ric	gor Dvorskiy fovember 20, 2017 at 1:33:42 PM PST k Singer : Re: Fwd: The forms for
Please s	ee attached.
Thanks	
О	n November 20, 2017 at 3:52 PM Rick Singer wrote:
So	ent from my iPhone
В	egin forwarded message:
	Date: November 20, 2017 at 10:53:08 AM PST To: Rick Singer Subject: RE: The forms for
	Hi Rick,
	I help support Bill here at TPG. Please find the form attached. Let me know if you have any questions.
	Thanks!



From: Rick Singer

Sent: Monday, November 20, 2017 10:25 AM

To: McGlashan, Bill

Subject: The forms for

Bill the forms are attached. Please fill out the section for including his schools CEEB code. Then send back to me as a pdf file and I will forward to West Hollywood College Prep to fill in their portion.

Thanks

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Any disclosure, copying, distribution, or the taking of any action concerning

the contents of this message and any attachment(s) by anyone other than the named recipient(s) is strictly prohibited.



Request for Arranged Testing 2017–2018

General Information

- The test coordinator is responsible for completing this form.
- Incomplete and/or unsigned forms will delay processing.
- · Faxed or emailed forms will not be accepted.
- Do not register online.

A. Examinee Information (print or type)



B. Test Coordinator Information (print or type)

DVORSKIY IgOR		Director	
Name (Last, First, Middle Initial)		Title	Market Control of the
West Hollywood Colle	Se Prepare	etory School	
School Name (attach explanation if not the examinee's school)		7	
			00000000
Street Address of School (required for shipping materials)		PO Box	
West Hollywood	CA	90046	USA
City		ZIP/Postal Code	Country
			T T T T T T T T T T T T T T T T T T T
Annual Control of the			
Emai		10 Digit Daytime Phone	Nillimioter

C. Testing Window (select one)

- Mark only one testing window.
- Send this request no later than the deadline for the selected testing window.
- Postmark deadlines are receipt deadlines for locations outside the US and Canada.

Testing Window	Postmark Deadline
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	March 9
I June 9–July 1, 2018	May 4
☐ July 14–August 5, 2018*	June 15

^{*}No test centers are scheduled in New York for the February and July test dates. February and July testing is available only in the United States, US Territories, Puerto Rico, or Canada.

D. Test Option (select one)

ACT (no writing)

ACT with writing

E. Reason for Arranged Testing

Check one and include any required documentation.

- 1. \(\Gamma\) (04) Religious faith prohibits Saturday testing and no non-Saturday test center established for any test date within 75 miles. Include a letter from a cleric (not a relative) or a notarized statement to verify the prohibition.
- 2. [7] (05) No test center in the country for any test date.
- 3. (08) Within the United States or Canada only:
 No test center established for any test date within 75 miles.
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authorities in the United States.

Signature

G. Examinee Statement

I certify that I am the person whose information is submitted in accordance with the Policies for ACT Arranged Testing on this form and in the attached documentation, if any, and that the information provided is true and accurate to the best of my knowledge. I understand that by submitting this form, I consent to the ACT Privacy Policy (www.act.org/privacy.html), which is incorporated into these Policies for ACT Arranged Testing by reference, including consent to the collection of personally identifying information and its subsequent use and disclosure. Without limiting the above statement, I specifically authorize the release to ACT of diagnostic information by school officials, physicians, or others having such information, and full documentation, if requested. I understand that any documentation provided to ACT will remain with the application and will not become part of my examinee score record.

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H. Fees

Payments must be in the form of a check* or money order payable to ACT in US dollars and drawn on a United States or US affiliate

If eligible, examinees may pay with a fee waiver.

Description	Fee	Location(s)
ACT (no writing)	\$46.00	Within the United States, US territories, Puerto Rico, or Canada
AOT (no writing)	\$93.50	All other locations
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	\$110.00	All other locations
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Test Date Change	\$26.00	All locations
Test Center Change	\$26.00	All locations

^{*}This is notification that when you pay by check you are authorizing ACT, Inc., to convert your check to an electronic entry. When we use this information from your check to make an electronic funds transfer, funds may be withdrawn from your account as soon as the same day you make your payment, and you will not receive your check back from your financial institution. If your check is returned to us due to insufficient or uncollected funds, it may be re-presented electronically and your account will be debited.

I. Return of Request Form.

Detach and mail this completed form, all required supporting documentation, and payment to:

ACT Arranged Testing 301 ACT Drive (PO Box 168) lowa City, IA 52243-0168

^{**}If a Request is postmarked after the regular deadline but received before the late deadline, it will be processed for the preferred test date IF the late registration fee is included.

Exhibit C

From: McGlashan, Bill

Sent: 12/4/2017 10:00:32 PM

To:

This message has been archived. View the original item

Can you book me flight to LA. If commercial, needs to be about 6:30 Friday and return at 2pm on Sat. If not possible: NetJets, can do LA Friday at 5:30 and return Sat at 1pm. Please book us a table on the roof of Waldorf for dinner, and ask for heater. If you have to, go through so office.

Bill McGlashan Founder & Managing Partner | TPG Growth Co-Founder & CEO | The Rise Fund





DISTANCE: 332 SM EST. TRAVEL: 1 H 0 M



FLIGHT RULE: PART 135



Prior to boarding, each adult passenger must present a government-issued identification such as a current passport or driver's license. This is required by the Transportation Security Administration.

DEPARTURE SERVICES

AIRPORT: SAN FRANCISCO INTL

Catering: 11

2 Wall Street Journal (Not Available on Sundays)

1 New York Times

Ground: 🛱

Please let us know if we may assist you with any ground transportation.

ARRIVAL SERVICES

AIRPORT: SANTA MONICA MUN

Ground: 🛱

Please let us know if we may assist you with any ground transportation.

COMMENTS

Request Instructions:

Code:

Contract Tail:

ADVISORY NOTES

Security The Transportation Security Administration prohibits carriage of certain items on commercial aircraft. The list of such items can be found at www.tsa.gov.

<u>Hazardous Materials</u> Federal law prohibits carriage of hazardous materials aboard the aircraft (whether in luggage or on person). Violation of these laws may result in five-year imprisonment and penalties of \$250,000 or more.

Restricted hazardous materials include any quantity of explosives, flammable liquids or solids, compressed gases, oxidizers, poisons, corrosives, and radioactive substances.

Spare lithium batteries for electronic devices may be carried on person, but not in luggage that is placed in designated baggage or cargo compartments. However, devices with installed batteries may be carried in luggage placed in designated baggage or cargo compartments. Furthermore, e-cigarettes and vaping devices may be carried on person, but not in luggage placed in designated baggage or cargo compartments.

Oxygen Federal law prohibits carriage of compressed oxygen cylinders aboard the aircraft. However, Portable Oxygen Concentrators (POC) may be used during flight. The device must bear a label on the exterior, with the following statement in red lettering: "The manufacturer of this POC has determined this device conforms to all applicable FAA acceptance criteria for POC carriage and use on board aircraft." This label is not required on certain concentrators that had been previously approved by the FAA, for carriage.

If you have any doubt regarding an item you intend to carry aboard the aircraft, please contact your Owner Services Team, or advise the Captain, prior to boarding the aircraft.

The U.S. Department of Transportation (DOT), with the Federal Aviation Administration (FAA) and the Pipeline and Hazardous Materials Safety Administration (PHMSA), has issued an emergency order to ban all Samsung Galaxy Note7 smartphone devices from air transportation in the United States. Effective Saturday, October 15, 2016, the Samsung Galaxy Note7 device may no longer be transported on one's person, in carry-on baggage, or in checked baggage on flights to, from, or within the United States. This prohibition includes all Samsung Galaxy Note7 devices.

SUMMARY OF RESERVATION NO.



Dec 08, 2017

Phenom 300 Signature KSFO KSM

KSMO

17:30 - 18:30 PST

18:30 - 19:30 PST

MedAire: Medical and travel support for NetJets Owners and Marquis Jet Card Owners worldwide
In the event of a medical incident while traveling, NetJets Owners and Marquis Jet Card Owners can call MedAire at immediate, detailed, expert medical information and assistance anywhere in the world, 24 hours per day. For more information about MedAire services, please contact your Owner Services Team.

From: on behalf of Sent: To: CC:	NetJets NetJets 12/9/2017 1:21:38 PM
Subject:	NetJets itinerary: Sat Dec 09, 2017 - KBUR to KSFO - Reservation
This messa Hello again	ge has been archived. <u>View the original item</u>
I have added know if there	to the flight home for today and have attached an updated itinerary. Please let me e is anything more I can do.
Sincerely,	
Tarrant NJ L	LC
Reservation	
Saturday De	ec 09, 2017
Request:	
BURBANK KBUR	
SAN FRANCI KSFO	ISCO
2:45 PM	
3:57 PM	

[https://www.netjets.com/Resources/img/itinerary/email-map-icon.png]

<a href="https://urldefense.proofpoint.com/v2/url?u=http-3A_maps.google.com_-3Fq-3D2800-2520North-2520Nort

2520Clybourn-2520Avenue-2520Burbank-2C-2520CA-

252091505&d = DwMCaQ&c = QbuapHRvbn0JdC8vTVkPHg&r = DZSf3A2HmIhHYlRr2RpnTQzcoYv6LPhqL5WFusAdEo0&m = o-

Million Air

Signature Flight Support

https://www.netjets.com/Resources/img/itinerary/email-map-

2520North-2520Access-2520Road-2520San-2520Francisco-2C-2520CA-

252094128&d = DwMCaQ&c = QbuapHRvbn0JdC8vTVkPHg&r = DZSf3A2HmIhHYlRr2RpnTQzcoYv6LPhqL5WFusAdEo0&m = o-

 $\label{eq:continuous} $$qVMdHifgFVOGP8tbVa6yhPocgI3ISLfb2MNAJNpB4&s=LHWSFxbTiIOJJPmjjQK25C_Sn8jik_rfg-vf7Dlb7O8&e=>$

Travel Details

Travel Time: 1H 12M

Requested Aircraft: Citation Excel/XLS *

* This Citation Excel/XLS upgrade is subject to availability on the day of your departure. The Citation Excel/XLS is guaranteed for this flight.

Passenger Info

2

Lead Passenger: William McGlashan

Contact Person: William McGlashan

Phone #:

Inflight Catering / Ground Transportation

[https://www.netjets.com/Resources/img/itinerary/catering_off.png] No Catering R

Attachments:

Tarrant NJ LLC	.pdf	(27 KB)
KBUR to	KSFO.ics	(1 KB)
ATT00001.txt		(1 KB)

_	
From:	
on behalf of	
Sent:	12/9/2017 3:25:00 PM
To:	
CC:	

Subject: NetJets Flight Status Notification

This message has been archived. View the original item

NetJets Flight Status Notification

To ensure delivery, add to your contacts.

[NetJets]https://urldefense.proofpoint.com/v2/url?u=https-34.

 $3A__www.netjets.com\&d=DwMCaQ\&c=QbuapHRvbn0JdC8vTVkPHg\&r=DZSf3A2HmIhHYlRr2RpnTQzcoYv6LPhqL5WFusAdEo0\&m=2dfK1iktVaCUeJR5Y55Jd0zdILg38jqSc5W24E159qs\&s=A8pie4NOTZGsGymihjII_ESpRImB_UFX8dKU-tVfil4&e=>$

Request #:

Dear ,

Tail number has departed from BURBANK, CA.

ACTUAL DEPARTURE Saturday Dec 9, 2017 3:21 PM local

ENROUTE TO [http://image.e.netjets.com/lib/fe9613727563027c77/m/1/ArrowGrey.png] SAN FRANCISCO, CA KSFO

ARRIVAL Saturday Dec 9, 2017 4:33 PM estimated 3:57 PM requested

Signature Flight Support

Exhibit D

From: Sent:

12/4/2017 12:20:07 PM

McGlashan, Bill To:

Subject:

I will check on Waldorf.

I have the check taken care of, already confirmed it will be sent via Fed-Ex.



From: McGlashan, Bill

Sent: Monday, December 04, 2017 12:18 PM

To:

Subject:

's office to book me a room at the Waldorf Astoria for Friday night. Need two Can you go through beds.

Also, please make sure they fedexed the check to Key Foundation.

Bill McGlashan

Founder & Managing Partner | TPG Growth Co-Founder & CEO | The Rise Fund

Exhibit E



To YOU

Date: 11/30/2017 09:47:57 AM

Steve from Bill McGlashan to fund our foundation for testing at West Hollywood College Prep-

for son

Can you send me details where I send the 50

To YOU

Date: 11/30/2017 09:47:58 AM

payment and who I make it out to etc?

To: Rick Singer

Exhibit F

From: Steve Masera

Sent: Thursday, November 30, 2017 10:30 AM

To: McGlashan, Bill **Subject:** West Hollywood Prep

Attachments: scan0001.pdf

Hi Bill,

Attached is your invoice and information or payment regarding West Hollywood Prep. You are welcome to wire the funds or remit a check.

Thanks,

Steve R. Masera

Director of Finance

The Key



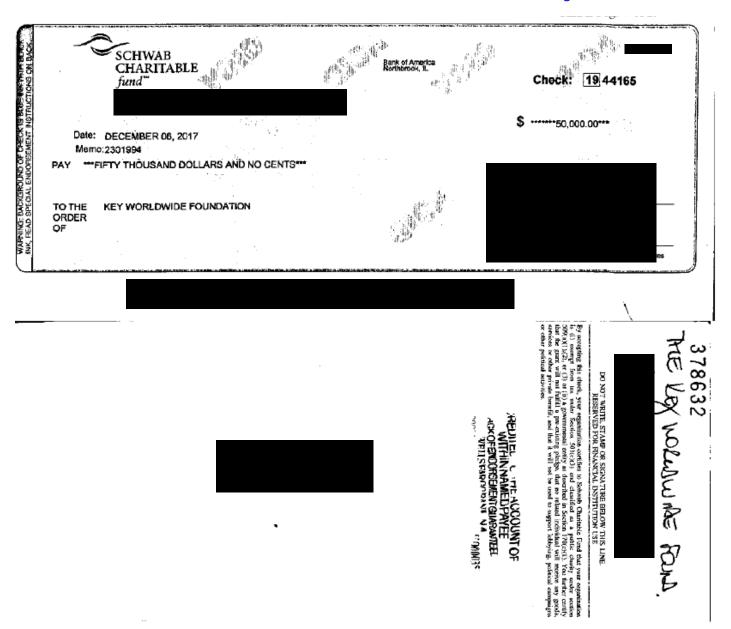
2				×		
8	n	V	~	8	C	
蜀	養養	A	v		v	•

Bill To	

Date	Invoice #
11/30/2017	1149

Description		Amount
egarding West Hollywood College Prep	^	50,000.00
fire Instructions: The Key Worldwide Foundation	n, mangaman mananan kananan ka	
outing #:		
ecount #:		
wift Code;		
ank Information:		
ax ID:		
501c3 FEIN	Total	\$50,000.

Exhibit G









Statement Period October 1, 2017 to December 31, 2017

Investment Advisor

AJ WEALTH

Special Account Name

MCGLASHAN FAMILY CHARITABLE FUND

Donors

٠

WILLIAM E MCGLASHAN JR

Donor Relations and Account Information

Call Donor Relations

E-Mail

Fax

Visit Our Web Site www.schwabcharitable.org

WILLIAM E MCGLASHAN JR MCGLASHAN FAMILY CHARITABLE FUND

29/12-CFCA1801-000788-SML-10004000000 153957 *





Statement Period
October 1, 2017 to December 31, 2017

Investment Detail - Other Assets (continued)

Description	Quantity	Price	Value	% of Account Assets

Grant Distribution Detail

Payment Issued	Payment Cleared	Recipient Organization	Amount
12/06/2017	12/13/2017	Key Worldwide Foundation	\$50,000.00
Total Amount of G	Grants Distributed		\$107,500.00

Transaction Detail

Settle Date Trade Date Transaction	Description	Quantity	Unit Price	Total Amount

Page 5 of 8

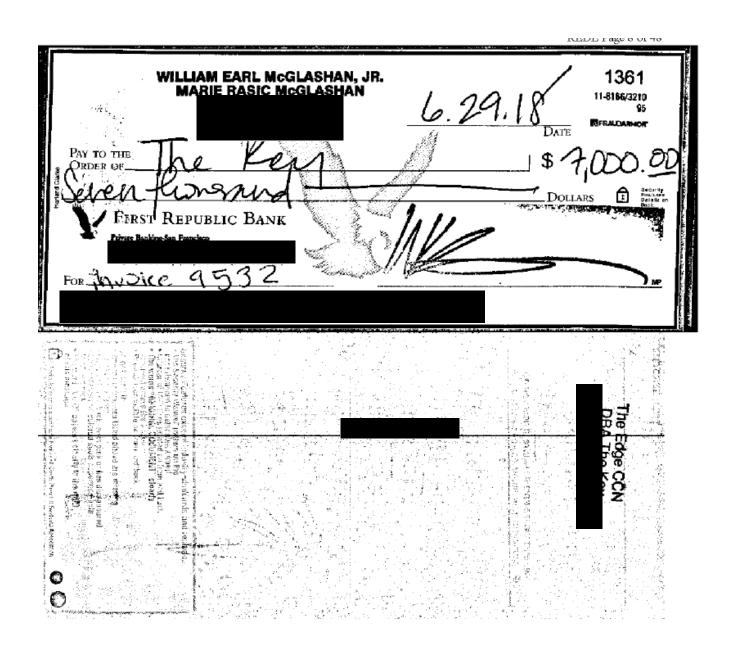




Exhibit H

1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE DISTRICT OF MASSACHUSETTS
3	
4	* * * * * * * * * * * * * * 19CR10074-NMG
5	UNITED STATES OF AMERICA*
6	VS. * APRIL 12, 2019 * 2:38 P.M.
7	MARK RIDDELL *
8	* * * * * * * * * * * * BOSTON, MA
9	
10	BEFORE THE HONORABLE NATHANIEL M. GORTON
11	DISTRICT JUDGE
12	(Rule 11 Hearing)
13	
14	APPEARANCES:
15	FOR THE GOVERNMENT: ERIC S. ROSEN, AUSA
16	JUSTIN D. O'CONNELL, AUSA LESLIE WRIGHT, AUSA
17	United States Attorney's Office 1 Courthouse Way
18	Suite 9200 Boston, MA 02210
19	FOR THE DEFENDANT: BENJAMIN STECHSCHULTE, ESQ.
20	Stechschulte Nell, PL 1105 W. Swann Ave.
21	Tampa, FL 33601
22	Court Reporter: Debra D. Lajoie, RPR-FCRR-CRI-RMR 1 Courthouse Way
23	Boston, MA 02210
24	
25	Proceeding reported and produced by computer-aided stenography

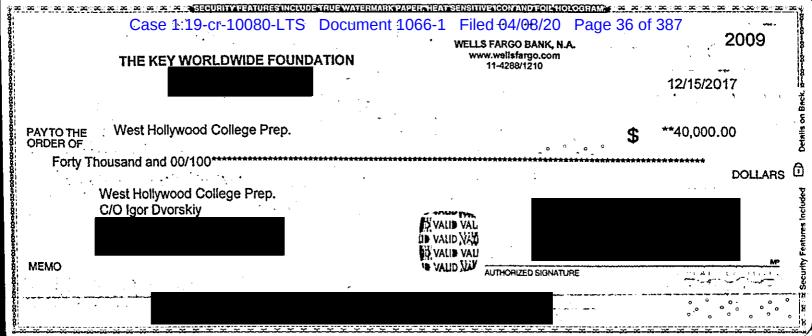
answers on the SAT. After the exam, Elizabeth
Henriquez picked up Riddell and her daughter, and they
celebrated their successful cheating in the car ride to
Riddell's hotel. These scores helped the Henriquezes'
daughter gain admission to and enrollment at Georgetown
University.

The cheating scheme then evolved. Singer bribed test administrators at two testing sites, one in Los Angeles and one in Houston, Texas, charged Defendants Igor Dvorskiy in Los Angeles and Niki Williams in Houston. Essentially, the scheme worked as follows: Riddell would fly to Los Angeles or Houston, proctor the students' exams, and then after the student had left, Riddell would correct the students' answers. Riddell was paid approximately \$10,000 each time.

As an example, in December of 2017, Riddell flew to Los Angeles where he proctored the ACT exam of the son of charged Defendant Bill McGlashan. Riddell corrected the student's exam answers after the ACT test, earning the student a 34, which is a score in the top one or two percent in the nation. These scores were then sent to a variety of colleges as part of the admissions process, including Northeastern.

As another example, in February, 2019, Riddell

Exhibit I



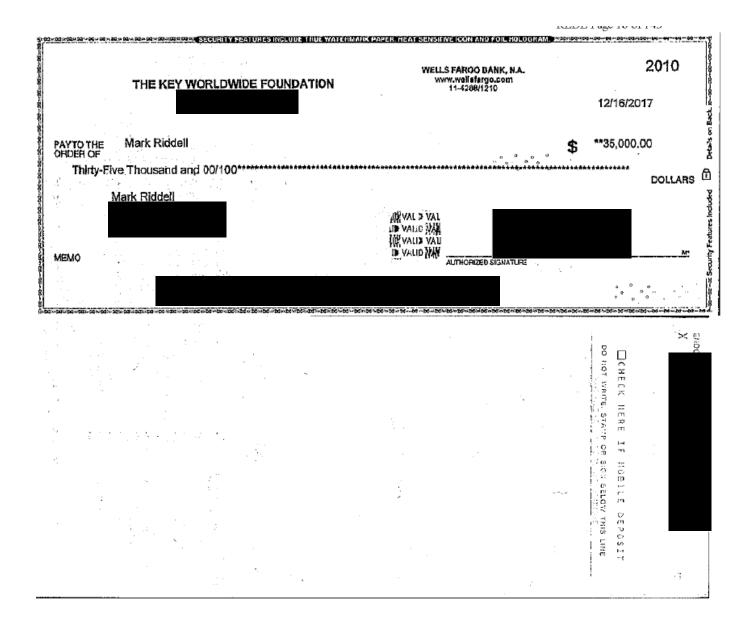




Exhibit J

07/30/2018 15:04:47 Incoming Call, Rick Singer and MCGLASHAN) (Bill

[Session 4146]

SINGER	Bill.
MCGLASHAN	Hey Rick, how are you?
SINGER	Great, how about yourself?
MCGLASHAN	I'm good. How go the wars?
SINGER	Uh, things are good. We are all we got rid of a couple of the
	ideas and companies.
MCGLASHAN	[Laughter]
SINGER	And, we are, we made some amazing traction in some areas
	we never thought, um, of doing, and it impacts more people
	than anybody on the planet.
MCGLASHAN	Wow.
SINGER	Um, we're involved in this now. We signed a deal with
	and uh, we created a platform called the recovery
7.5007 1077 177	platform.
MCGLASHAN	Mmmm.
SINGER	And now we're doing a whole, we create, I took, I hired six
	addicts, and we created seven month mobile app for addiction
	after they leave rehab.
MCGLASHAN	Wow.
SINGER	And then the state of North Carolina hired us, so they were
	the first state to do the opioid program. Every state has it,
	which is to take on all of the um, opioid abusers through the
MCCI ACIIANI	courts.
MCGLASHAN	That's awesome. As a, as an attempt to keep them off opioids
CINCED	[OV] and,
SINGER	Yes, they're going to force them into doing you know, they
	got to go get their testing, and then here's their seven month program. It's online. That we created a counseling program
	for them. For a group of individuals [UI] on a daily basis
	and, then we're all the silver living homes all over. We've
	already started in Sacramento and Orange County to test it.
	It's pretty amazing because this issue is huge in not only
	opioids, but alcohol, drugs, everything.
MCGLASHAN	No, it's uh, it's uh, a devastating problem for society. I
	mean it's incredible.
	mean it a mercanore.

SINGER	But yeah, and we got the, you know, we got the
SINGEN	partnership, and we've got the first state partnerships [IA]
	ability. Um, now we just got to get everybody enrolled and
	then get started.
MCGLASHAN	That is so cool, Rick. That's a, that's a, that's a fairly dramatic
MCGLASHAN	pivot from what you've been doing.
SINGER	Well that's one of them, yeah. And then the
SINGER	that's . And then the job business is actually
	changed too, because that became a talent aggregation. I
	bought a company called . Which they have all
	the PhDs coming out of the 80 top colleges in America, and
	none of those People can get academic jobs, so right away
	they've got to get a real job.
MCGLASHAN	Mmm.
SINGER	And they don't even know what the hell to do. They have no
	idea. So, we got a subscription with all these universities,
	and then we go after individually helping these people, and
	they pair, so now I just created a virtual grad school, because
	the masters population is three times as big as the PhD
	population.
MCGLASHAN	Mmm
SINGER	So when I met with the people, I said, how about if I
	can give you a list of all the masters candidates from these
	a sha a la and handa thair atata. Handa tha haharrian Handa
	schools and here's their stats. Here's the behavior. Here's
	your skill. Here's the PhD candidates. I got 'em all. What do
	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find
	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find them?
MCGLASHAN	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find them? Gotta love that.
SINGER	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find them? Gotta love that. Right, and I got all the
SINGER MCGLASHAN	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find them? Gotta love that. Right, and I got all the They'll pay them very big origination fee on that.
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SINGER MCGLASHAN SINGER MCGLASHAN SINGER	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find them? Gotta love that. Right, and I got all the They'll pay them very big origination fee on that. Right, so I figured, that's the best way to get them. Just own the talent. Mmhmm. So that business is going well. And then business to getting into colleges, just about ready to launch the beta test, so we're ready to start there. So you know, I learn a lot. I get my ass kicked a lot. But that's okay.
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SINGER MCGLASHAN SINGER MCGLASHAN SINGER	your skill. Here's the PhD candidates. I got 'em all. What do you say? They're like, well shit, then we don't have to go find them? Gotta love that. Right, and I got all the They'll pay them very big origination fee on that. Right, so I figured, that's the best way to get them. Just own the talent. Mmhmm. So that business is going well. And then business to getting into colleges, just about ready to launch the beta test, so we're ready to start there. So you know, I learn a lot. I get my ass kicked a lot. But that's okay.

	stuff we've done at this point.
SINGER	No I haven't, no.
MCGLASHAN	So we're now the largest education investor in the world at
	Rise.
SINGER	Okay.
MCGLASHAN	From a zero start, as you know.
SINGER	Right.
MCGLASHAN	A year and a half ago. Um, so it, it ranges from, you know K through 12 tools. We just bought It'll be public as of, I think, I think the press is tomorrow, but um, which is the company that, um math, math company run by this woman, that does um, uh, completely customized, uses algorithms to completely customize the math learning journey for students.
SINGER	Okay, that's cool.
MCGLASHAN	Amazing outcomes, you know data behind it. was the original investor in it.
SINGER	Okay.
MCGLASHAN	And it's become a big company, um, and by far the most, um, interesting on the spectrum of, of um, you know tools that allow you to deliver. You know, it's a little like a except that
SINGER	Right.
MCGLASHAN	doesn't actually give you a customized path, it just responds. It just allows you to sort of create your own path.
SINGER	Right.
MCGLASHAN	Um, there, it's used in the schools instead of as an adjunct um, program. We bought
SINGER	Okay.
MCGLASHAN	Um, um, with we and they partnered to buy the company. We just closed that deal.
SINGER	Okay
MCGLASHAN	Um, obviously you already knew about and what we're
SINGER	Yup.
MCGLASHAN	Our sorry, if we ever find what we're doing there. Um, we
	bought, funded which is a, um, a company that's leading technical coding platform in Latin America.
SINGER	That's great.
MCGLASHAN	Um, which is really cool, because, it's, it, uh, it's sort of

	partnered with all the big, uh, employers, uh to get these folks
	trained up, 'cause they need 'em, in that, in that environment.
	Um, we did with India, which is a, school in a
	box solution, focused on creating affordable private schools
	in India. We're actually doing a platform in, in uh, Africa.
	Which buying eight schools to start with in Nigeria, but doing
	it with a blended finance model with philanthropy.
SINGER	That's great.
MCGLASHAN	[OV] to make economics work.
SINGER	That's great.
MCGLASHAN	And then, we're, we, finally got agreement from . I don't
	know if you know over at ?
SINGER	Yeah, we, uh, uh, he's actually after me really hard, because
	we're opening 24 universities in China.
MCGLASHAN	Oh, interesting.
SINGER	And, so, uh, called me from
	. He wants to be our partner there. Because you
	can't put university [IA], a family that has the, um, that has
	the license.
MCGLASHAN	Mmm.
SINGER	So I need, I have to have an American partner that can give
	me I don't need a degree, I need to create a certificate
7.5007.1077.177	program.
MCGLASHAN	Mmmhmm.
SINGER	So that the Chinese can actually do it in hospitality, digital
	media, um, and then service oriented stuff, like nursing. And
	there's between five and twenty million people in each part of
MCCI ACIIAN	the second and third tier cities in China, right?
MCGLASHAN	Mmhmm.
SINGER	And our partner in China is And I is one of the biggest companies in China, so they're going to be
	all the real estate stuff, and it's all online. So, we may end
MCGLASHAN	I love it.
SINGER	Going, to, we may end up going to with
SINGLA	from . Because you know, they won a
	public battle with the Because you know, they won a
MCGLASHAN	Mmhmm.
SINGER	But, quite a guy. He's got a [OV]
MCGLASHAN	Yeah, he is.
	····-, · · · ·

SINGER	He's got a, he's done an amazing job.
MCGLASHAN	Well, so what, so what he's done with us, is you know the
	program, the four year degree program, that he, that you
	know is the program.
SINGER	Yup.
MCGLASHAN	That's, again this is just between you and me, for now, but
	that's, we're privatizing that, and we're the shareholder,
	alongside . Um, we've gotten his commitment that we
	bring four, three other universities in, so they're four to start
	with, um,
SINGER	Okay.
MCGLASHAN	is one. Um, there's one in Australia. Leading program in
	Australia, I forget the name of it. But anyway, it's a platform
	of universities. Um, we're way down the track with
	and a few others now as well, to launch the same program,
	you know as an employee benefit offer [OV] as a four year
	degree. 15
13	07 to 15
13	11 [IA]
MCGLASHAN	Rick
15: 13: 11 to 15:1	3:15 [IA]
SINGER	program that you guys are doing. There's 70,000
	kids behind.
MCGLASHAN	kids behind. Mmhmm.
	kids behind. Mmhmm. So he asked me if we could do this across the country for
MCGLASHAN	kids behind. Mmhmm. So he asked me if we could do this across the country for them, so that we could get to the number they want to get to.
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MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN	kids behind. Mmhmm. So he asked me if we could do this across the country for them, so that we could get to the number they want to get to. So, I know they're not getting to the numbers, um No, they're not. [UI] made of steel. And so they asked. That's right. They asked me to go, I help them with that. So All this, all this sort of says, we've got to get, you, me and together in a room. And probably, you know, um, and just have a conversation together. We should just air out, here's exactly where we are, and what we're doing. Yup.

	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	these things, we, like, maybe some of your colleges could be
MCCI ACIIANI	the ones we use in China.
MCGLASHAN	Yup, totally.
SINGER	Right, right, because.
MCGLASHAN	Totally.
SINGER	I got, I got to have this cheap way of approaching this
	certificate program which does not affect their cert their
	accreditation, that's what makes it so great.
MCGLASHAN	Mmhmm.
SINGER	They can pretty much do whatever they want because I'm
	partnering with, the hospitality, I got is the certificates going
	to be called the intercontinental certificate. So that in China,
	now you feel like you gotbecause the American university
	doesn't mean diddly to them.
MCGLASHAN	Yeah.
SINGER	And those right, and those places.
MCGLASHAN	That's right.
SINGER	Yeah, we should do that, absolutely.
MCGLASHAN	I love it. I love it. Um, jumping, so I'll have Jess coordinate
	for us to do the meeting.
SINGER	Okay, okay. What's going with ?
MCGLASHAN	It's very timely, because the momentum couldn't be better.
SINGER	Absolutely.
MCGLASHAN	So just quick on . He feels really good.
SINGER	Good.
MCGLASHAN	I mean he's, he's, you've probably saw his grades have been
	sort of dramatically improving.
SINGER	Yeah, yes.
MCGLASHAN	I mean, he's actually working, which is sort of amazing how
	boys. It just takes them a while I think to
SINGER	Yup.
MCGLASHAN	Clue in.
SINGER	And he's got the confidence, he's got a score, he's got
	confidence.
MCGLASHAN	Yup, totally. I mean it's sort of miraculous. He's engaging.
	His internships have been brilliant. You know, he was at
	you know for the first two weeks.
SINGER	Right.
MCGLASHAN	And then went really well. That was his second
	round at . They love him. Um, and then um, and
·	• • • • • • • • • • • • • • • • • • • •

	then he's now down at you know, working. Um I, I've set up through the, you know friends of mine who are
	involved there this lunch on Friday with
SINGER	Yup.
MCGLASHAN	Um, the dean of the, of the Iovine and Young [PH] Academy.
SINGER	Right.
MCGLASHAN	Um, he's already met the, the number two dean, the vice dean,
SINGER	Okay.
MCGLASHAN	This dean asked if, if, we could have lunch, uh, or a meeting.
	And I sort of thought, shit, I don't have the time, but I figured,
	you know, lunch is a better
SINGER	Absolutely.
MCGLASHAN	engagement model, right. Uh [OV] you had said to me
	before, do a meal, get to know these people.
SINGER	Always.
MCGLASHAN	So, yeah, so we're, well we'll have lunch on Friday, and then
	she'll give us a tour, a couple hours with her. Um, what they
	ask, I went through a buddy of mine on the board there. I've
	got a number of friends, quite a few friends that are of the
	board. Um, and I, basically said the following, I wanted to
	run this by you and get your instinct on it. But I said, look,
	the issue is with early admission, with these schools like a
	Brown, the only way I can really lean on my friends there, et
	cetera, is if he applies early.
SINGER	Correct, and applies
MCGLASHAN	Um, yeah, so it's bind The problem is it's binding. And all
	else being equal, if he were to get into Iovine and Young, he
	would go to SC over Brown.
SINGER	Right.
MCGLASHAN	The clear sense I'm getting. You should have your own
	discussion with him.
SINGER	He, that's the way it felt last time I was with him.
MCGLASHAN	Yeah, so, what I said to and he's the guy that helped me.
	on the board there. Is I said, and he's not had
	this explicit conversation with her, but he said, um, I would
	need, you know, he's basically the manage of we need to
	know that is going to get in. In other words, other
	wise he's better off applying to Brown. It's not that you need
	to contractually agree or anything, but basically, he's getting

in. So, that's that's what I'm trying to angle for, is that after,
she has his, his uh, [OV], self cores and, uh, and his grades.
Right.
Already. get, sent them over to her. And so she wanted
those, because she said I need to know if he's going to get
into SC. I, I said to , look, I really have a hard time
imagining he can't get into SC, generically.
Now his grades are not good enough to get into SC.
Is that right?
Oh yeah, oh yeah.
That's amazing. Wow, okay.
[OV] Because the issue is not [UI] that his grades aren't good
enough. The number of kids applying from schools that are
stronger than him.
Yup.
[IA] That [UI] the issue. So, she's, that's why she's, she's so,
she's probably going to tell you, is, think about this. Here's
some strategies.
Yup.
The department, each department has a VIP list.
Mmhmm.
And, essentially what they do, is they can walk a kid through
admissions with Tim, and say we want this family. The
problem occurs
3:20 [IA]
Rick, you're breaking up.
Oh, sorry.
Yup
[IA]
You said the problem occurs and I lost you.
Yup, so let me I'm going to go to a different place, one
second. So what happens is they have a VIP list. Each
department, each dean, has their own VIP list. And
essentially at some point they get the opportunity to go to
Tim, and say, here's my list. This is what I want. That's how
they that may not happen until January, February.
Mmhmm.
They may give us a nod, saying, hey, it looks good. It looks
good. But, you haven't really, you haven't really sat in front
of Tim and said, it's done.

MCGLASHAN	Yup.
SINGER	Okay. So, I was thinking about this for you. I don't know
	how you want to handle it. I would just give you some.
	Here's some approaches maybe. Okay.
MCGLASHAN	Yup.
SINGER	I don't know if this makes sense. So, one is to go just down
	that path, and my guess is you'll get accepted, and it'll
	happen, but you won't know, until you know, mid-spring,
	and/or right before they get the admissions letter right before
	March 25th. Which is not a good
MCGLASHAN	Yup. Yup.
SINGER	Not a good, not a good feeling for you guys, not knowing.
MCGLASHAN	Yup.
SINGER	Right, 'cause they're going to say, it's looking good, it's
	looking good, well, how about like let's get it done.
MCGLASHAN	Yeah.
SINGER	Okay, so, another way some people have done it, is, I told
	you I have a side door there. There is a financial thing in
	there, but what happens is we get them accepted in the fall,
	earlier. Latest is first week of February, or January because
	they want to see first semester grades. But let's just say it
	happens in the fall, then what would have to happen, would
	make it much easier, is your department says, we'll take that
	kid, because, what will happen is, when we apply like that,
	they're going to say, yeah, we'll admit him, but we can't say
	he's getting into that program. But if the program already said we'll take him.
MCGLASHAN	That's great.
SINGER	Right. So you would go
MCGLASHAN	That's great.
SINGER	You would go through athletics.
MCGLASHAN	The, the, the interesting thing is the side door at, that
	is working at the Iovine and Young academy is, which
	doesn't apply to overall admissions to your point. But even
	here, I'm going to have to play games. They're saying,
	said, look, you've got to be willing to join the board of Iveen
	and Young, you personally. [OV] And, you know, I told her
	you'll write, a one to three million dollar check. And, and uh,
	that's, you know, I said, wow, okay. The only awkward thing
	for me is I don't want I said if I, even if I agree to do that, I

	would want to join the board a year after gets in or
	something, so I don't create a weird dynamic for him, you
	know.
SINGER	Sure, so, so, in this path, you'd pay 250, you'd get accepted.
	Uh, let me get his stuff and I'll take it to them. If they can
	accept him in the fall.
MCGLASHAN	Yup.
SINGER	He may be It may be before he even applies.
MCGLASHAN	See that would be great.
SINGER	Right.
MCGLASHAN	I would do that in a heartbeat.
SINGER	Right, and then you get this unofficial, official letter.
MCGLASHAN	Now does he, here's the only question, does he know? Is
	there a way to do it in a way that he doesn't know that
	happened?
SINGER	Oh yeah. Oh he
MCGLASHAN	Great.
SINGER	What he would know is, that I'm going to take his stuff, and
	I'm going to get him some help, okay.
MCGLASHAN	So that, that he would have no issue with. You lobbying for
	him. You helping use your network. No issue.
SINGER	That letter, that letter comes to you.
MCGLASHAN	Yup.
SINGER	So, my families want to know this is done.
MCGLASHAN	Yup.
SINGER	Right, so they want this letter to come to them, so I have
	them, I have admissions, and that's why I extend the letter to
MCCI ACIIAN	you, you hold it.
MCGLASHAN	Right.
SINGER	You don't have to tell him a thing.
MCGLASHAN SINGER	Yup.
SINGER	At that, at that point, that, as soon as you get that letter, then they expect just a \$50,000 check, and it goes to Women's
	Athletics.
MCGLASHAN	Great.
SINGER	And then the other 200 comes in March after you get your
SINGER	official, official letter, but the letter you're actually getting is
	the same letter you're getting in March.
MCGLASHAN	I love it.
SINGER	Right, and they just do it that way.
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MCGLASHAN But again, he wouldn't, he wouldn't, have to see any of these letters. SINGER He wouldn't see any of them. MCGLASHAN Correct, what he would know SINGER None of them. MCGLASHANis Rick would say, hey, I had a great conversation, things are looking great. You know. SINGER Correct.
SINGER He wouldn't see any of them. MCGLASHAN Correct, what he would know SINGER None of them. MCGLASHANis Rick would say, hey, I had a great conversation, things are looking great. You know.
MCGLASHAN Correct, what he would know SINGER None of them. MCGLASHANis Rick would say, hey, I had a great conversation, things are looking great. You know.
SINGER None of them. MCGLASHANis Rick would say, hey, I had a great conversation, things are looking great. You know.
MCGLASHANis Rick would say, hey, I had a great conversation, things are looking great. You know.
things are looking great. You know.
SINGER Correct.
MCGLASHAN Keep your grades up, work hard, but things are looking great. That kind of thing.
SINGER Correct. I have to keep, I have to do a profile for him in a
sport, which is fine, I'll create it. You know, I just need him
I'll pick a sport and we'll do a picture of him, or he can, we'll
put his face on the picture whatever. Just so that he plays
whatever. I've already done that a million times. So
MCGLASHAN Well we have images of him in Lacrosse. I don't know if that
matters.
SINGER They don't have a lacrosse team. [OV] But as long as I can
see him doing something, that would be fine.
MCGLASHAN Yeah.
SINGER And then what happens is then what you have to do, because
this would be a specialty program, is that you have to then
talk to the department and say, hey listen, can you take him in
the department, we've gotten him accepted into the university.
MCGLASHAN Yup. Well I can handle, I think I, I mean I'll know after this
lunch. I think I can handle them at Iovine and Young.
SINGER Right.
MCGLASHAN Yeah. Which is where he really wants to go.
SINGER Right. So you're saying, hey listen, I think I can get him into
this school.
MCGLASHAN Yup.
SINGER Now, now, can you, 'cause they're going to come to you and
say, this is selective program, would you want this kid? And
he's quote an athlete who's coming to you. In fact, would you
take him? And the department says yes.
MCGLASHAN Now would she see that, 'cause, that, he's going to be fairly
well seen at the school, because half the board knows me, and
I'm going to be sort of calling in and asking people to help,
you know all those guys.
SINGER But, so, so, what I would suggest is have you called them?

	Any of them yet?
MCGLASHAN	No
SINGER	Good, don't.
MCGLASHAN	Okay.
SINGER	Because you don't need, because when this, the way this, the
	quieter it, the quieter this is, the better it's so, people don't say
	well, okay, this guy, why are all these people calling us. The
	kid's already been accepted. He's coming here as an athlete.
	He's already in. What you just want, is the person you're
	meeting with on Friday to say, you know what we want this
	kid.
MCGLASHAN	So she doesn't have to know how he got in. Is that the case?
SINGER	What I would say to her, if you want to have that discussion
	now with there, that we have friends in Athletics they
	are going to help us, because is an athlete, and they're
NEGGE AGILLAN	going to help us. From the
MCGLASHAN	But I can't say that in front of the can't say that it is the can't say the can't say the can't say th
CINCED	not.
SINGER	No, no, right.
MCGLASHAN	Yeah.
SINGER	And just say, you know what, we're going to get, we're going
MCGLASHAN	to get some, we're going to get people to help us. Why wouldn't, why wouldn't I say look, leave it to me to
MCGLASHAN	why wouldn't, why wouldn't I say look, leave it to me to worry about getting him in, 'cause I have a lot of friends
	involved in the school.
SINGER	Perfect, perfect.
MCGLASHAN	And, I feel confident, I can figure out a way to get the school
WICGERSIN	to help us. board's a friend.
SINGER	Correct.
MCGLASHAN	And, uh.
SINGER	Correct.
MCGLASHAN	You know what I mean.
SINGER	Correct, right, so you could you, what is going to happen
	when they see his application, he'll be flagged as an athlete.
MCGLASHAN	Okay.
SINGER	But once he gets, once he gets here, he just goes, he doesn't
	go to the athletic orientation. He goes to the regular
	orientation like all my other kids just did. They all got home,
	and everything's fine. The issue is the specialty program.
	And he could do

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MCGLASHAN	So how does he just as a, just as a, just as this plays out, my worry on this is, starts getting letters at home from	
	the athletics program and	
SINGER	He won't.	
MCGLASHAN	Okay.	
SINGER	He won't. What he will get in the summer, is a letter saying come to the athletic orientation. Okay, but here's what I would	
MCGLASHAN	What, yeah, what do we do about that.	
SINGER	Here's what I would do. I would just tell him. I would tell	
	him, listen I got lots of friends in athletics. You're an athlete kind of guy, and my friends in athletics are going to help you. So I'm letting you know. They're going to help you get in. Because they have the easiest way in. And, [OV] all the coaches, I'm friends with all the coaches. So, they're going to help you get in. And, um, but maybe here's a better idea. Maybe this is a better idea. We go this path. You work with the dean, but, but, how, how would you feel about, if you already know that he's going to get into the program, but we apply to letters and sciences as a regular student.	
MCGLASHAN	Yup.	
SINGER	Once he's there, when he goes to orientation, you, they, you switch him. Because the department's already said it's okay, you can switch him. Then	
MCGLASHAN	So what am I I'm switching him from what to what?	
SINGER	From letters and sciences, undeclared, to the program.	
MCGLASHAN	To the Iovine and Young?	
SINGER	Yes.	
MCGLASHAN	But what if he's able to get into the Iovine and Young	
CINCED	program out of the gates?	
SINGER	Well if he gets into the program out of the gate, [OV]	
MCGLASHAN	I think you have to Don't you have to get in anyway to one of the other	
SINGER	You do, but you are all have a relationship with these people, and they're already know that he's one of the spots. All I'm trying to do is cut away any other people looking in.	
MCGLASHAN	Yeah, yeah. So I guess, what I'm wondering, I think normally the way it works is you have to apply to the school period.	
SINGER	Correct, correct.	
MCGLASHAN	And then you separately apply to Iovine and Young. So they	

	expect you to get admitted to both places right.
SINGER	No, what happens is, when they see you, he's applying to
	Iovine and Young now, but you have to first be admitted to
	USC before Iovine and Young can take you.
MCGLASHAN	Right.
SINGER	But his application will actually say, and he'll write his essays
	to fit Iovine and Young.
MCGLASHAN	Okay.
SINGER	Does that make sense?
MCGLASHAN	Yeah, but they have a separate, what they have is a
SINGER	A supplement.
MCGLASHAN	A, well it's a, it's his pitch he has to do. To come down and
	present to and everybody for this idea
	that he has.
SINGER	Correct, it's a sup it's their supplement. It's that
	department's supplement.
MCGLASHAN	Yup.
SINGER	Yup, so let me do, my own, I'll do Let me take some of this
1.5001.4011.11	week and do my own research.
MCGLASHAN	Yup.
SINGER	As to what is the best way that it keeps him, nobody knows,
MCCI ACHAN	he doesn't know anything, and it can flow much easier.
MCGLASHAN	Perfect.
SINGER	Let me do that, and then that way, hopefully by Friday I'll
	have some answers so that you can at least be poised to um,
MCCI ACIIAN	have a discussion after that, with them.
MCGLASHAN	Exactly, exactly, that's perfect. That Friday, the focus of Friday'll be you know
SINGER	Intro.
MCGLASHAN	You know, intro, tell us about the school, vision,
SINGER	Yes.
MCGLASHAN	You know, where you going with this. Um
SINGER	Yes.
MCGLASHAN	Yeah, perfect. Um, that's great. And then I guess the part
	that was new news to me is that in order to use the, the uh,
	athletic sort of, you know, department side door if you will,
	he has to actually apply to letters and arts, he can't be
	applying to Iovine and Young?
SINGER	No, that's not true. I just was trying to figure out the easiest
	way.

MCGLASHAN	Got it.
SINGER	That, because it's a guarantees in letters and sciences. To get
	into Iovine and Young you need them to take him.
MCGLASHAN	What's, what's interesting, with the, friends of ours that went
	into the, that applied to film school, uh, that's friends with
	their [UI] daughter applied. She did not get in, but then she
	was pushed over to a generic, you know get into SC. So she
	got into SC, but she didn't get into the film school.
SINGER	[UI]
MCGLASHAN	What, where would she have gotten in? Was it, would it have
	been like letters and sciences or something? Where would
	they put her?
SINGER	Yeah, yeah, in letters and sciences. Absolutely.
MCGLASHAN	Got it. Got it.
SINGER	Because that's the big school. That's anthropology, the
	zoology, biology, economics, everything. The whole planet is
	in there. And that's where normally people start.
MCGLASHAN	Yup.
SINGER	Because they're not sure what they want to do.
MCGLASHAN	And then you go onto a new more, yup.
SINGER	Yes.
MCGLASHAN	Got it, yeah, because they have people transfer into Iovine
	and Young their sophomore year, but they make them start
	over and take the full
SINGER	Sure.
MCGLASHAN	program, even including the freshman courses.
SINGER	Sure.
MCGLASHAN	That are required at Iovine and Young. They want them to
	have the full four year
SINGER	Sure.
MCGLASHAN	program. Which is, which is, whatever it is, you know 60%
	of your course work, 'cause it covers so many different
	departments.
SINGER	Correct.
MCGLASHAN	In that, in that program. Okay, well, so you'll, you'll, you'll
	give me a heads up [OV] and then one other, just family
	question, with now entering his sophomore year, and
	sort of, the <u>process</u> is beginning, <u>we have him on time and a</u>
	half. I told yesterday, and by the way, who is
	the, who I think is the one who needs the most time, has no

	extra time currently. And, 's talking to the doctor that	
	assessed them, to get her to ask, to request time for . I	
	told her she should be requesting double time for all of them.	
SINGER	100% multiple days. No matter what, multiple days. So,	
SINGLIN	even if it's 50% time and a half, multiple days.	
MCGLASHAN	So is that a different ask to get multiple days versus	
SINGER	Well the 100%.	
MCGLASHAN	[OV] And if they get time and a half, can they use your	
Mediami	facility to take the test?	
SINGER	No, not unless it's multiple days.	
MCGLASHAN	So as long as it's multiple days, we're in.	
SINGER	Correct, correct. Like it could be [OV]	
MCGLASHAN	And they, that's a separate filing?	
SINGER	Overall it's the same. Well, so, you're saying 's got a,	
	time and a half.	
MCGLASHAN	Yeah.	
SINGER	So, what has to happen, is there has to be an appeal to get the	
	multiple days. The doc's got to come up with stuff	
	discrepancies to show why he needs multiple days. That he	
	can't sit six and a half hours taking one test.	
MCGLASHAN	Perfect.	
SINGER	And so if he gets multiple days, then I can control the center.	
MCGLASHAN	Thank you.	
	Yes.	
SINGER	res.	
SINGER MCGLASHAN	And then what about If you get a, if you get double time,	
	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes.	
MCGLASHAN	And then what about If you get a, if you get double time, you automatically get multiple days?	
MCGLASHAN SINGER	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes.	
MCGLASHAN SINGER MCGLASHAN SINGER	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes. Oh, so it's either multiple days with 1.5 or um, double, 2X time. Correct.	
MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes. Oh, so it's either multiple days with 1.5 or um, double, 2X time. Correct. Got it, okay, I'll make sure goes to work.	
MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes. Oh, so it's either multiple days with 1.5 or um, double, 2X time. Correct. Got it, okay, I'll make sure goes to work. And we don't care if it's SAT or ACT.	
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MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes. Oh, so it's either multiple days with 1.5 or um, double, 2X time. Correct. Got it, okay, I'll make sure goes to work. And we don't care if it's SAT or ACT. Yup, yup. Because, we're just going to take it one time and be done anyway. Yup, exactly. The going through the stress of her SSATs, which is totally cute and sad to watch. But it's like Jesus Christ. This whole testing thing is such a nightmare for	
MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER MCGLASHAN SINGER	And then what about If you get a, if you get double time, you automatically get multiple days? Automatically, yes. Oh, so it's either multiple days with 1.5 or um, double, 2X time. Correct. Got it, okay, I'll make sure goes to work. And we don't care if it's SAT or ACT. Yup, yup. Because, we're just going to take it one time and be done anyway. Yup, exactly. The going through the stress of her SSATs, which is totally cute and sad to watch. But it's like	

MCGLASHAN	It's awful. It really is.
SINGER	Agreed.
MCGLASHAN	Awful. Yeah. Alright, my brother.
SINGER	[OV] Okay, I'll talk to you [UI]
MCGLASHAN	My follow ups are to get us together with the group. And
	then you're going to let me know what the right plan of action
	would be. And I'm totally open to that if that's the right, uh,
	what the right approach is.
SINGER	Exactly, yeah, let me find out.
MCGLASHAN	Awesome.
SINGER	You got it.
MCGLASHAN	Okay.
SINGER	Take care.
MCGLASHAN	Thanks a lot.
SINGER	Yup, take care, buh bye.

Exhibit K

$08/22/2018\ 19:38:16$ Outgoing Call, William MCGLASHAN and Rick SINGER $\pmb{[Session\ 6574]}$

Voicemail	Hello this is Bill McGlashan, leave a message at the tone.
RS	Hey Bill, so we're gonna um met with SC, um, because the school does
	not have a football team um, I'm gonna make him a kicker/punter and uh
	they're gonna walk him through with football and I'll get picture and
	figure out how to photoshop and stuff so it looks like it and um, the guy
	who runs the biggest kicking camp is a good friend, so we'll put a bunch
	of stuff about that uh, on his profile and we should be uh in pretty good
	shape to get that uh done uh, it's just a matter of when I get the profile
	done, get it to them and figure out when they're gonna have a sub-
	committee meeting, so I'll let you know. Stanford said no, um too tough,
	grades too low um just don't want to uh make that an exception right now
	um for him, so I wanted you to know that as well and then I think I'm
	seeing you next Tuesday so if there's anything you need from me just let
	me know, see ya, buh-bye.

Exhibit L

$08/22/2018\ 19:46:25\ Outgoing\ call\ from\ Rick\ SINGER\ (RS)$ to William MCGLASHAN (WM) $\pmb{\hbox{[Session 6577]}}$

WM	Rick.
RS	Hey so you got an NFL punter huh?
WM	You there Rick?
RS	Yes.
WM	Oh there you are, perfect. Lost ya.
RS	You got an NFL punter.
WM	I I did. That's just totally hilarious. So
	heso this is for, so, the one part you
	were garbled at the beginning is the
	school doesn't have a football team,
	meaning, obv- obviously SC does. What
	does that mean?
RS	Your high school.
WM	Oh the high school. yes of course. Got it.
RS	So they asked me what sport could we
	put him through. And I said well, I don't
	want, you know, cause your school
	doesn't have football it's easy because I
	can say, because they have all these
	kicking camps and these kickers always
NA/A 4	get picked up outside of the school
WM	Yeah perfect. perfect.
RS	So I'm gonna make him a kicker. Um
WM	(laughs) He does have really strong legs.
RS	(laughs) Well, this will be forthis will be
WM	good for one of the
VVIVI	Maybe he'llmaybe he'll become a kicker. You never know.
RS	Yeah! Absolutely.
WM	You could inspire him Rick. You may
VVIVI	actually turn him into something. I love it.
RS	I know. Well I had a boy last year, I made
	him a a long snapper. And
WM	I love it
RS	He was 145 pounds. Long snapper. So.
WM	I love it. I love it. That is so funny. So so
	um, and then, just remind me again, we
	get all these done and the the obvious
	deal you and I talked about the \$50K and
	the \$200K. Andand then uh, do we
	know he's in? You and I at least know
	he's in?
RS	Yeah, yeah. Beacause when he gets in
	they'll send me a letter which will be the

	and you
WM	Yup
RS	The same letter that he's going to get
	later on.
WM	Yup.
RS	But it'll just be in your hands. It's always (OV)
WM	Perfect
RS	For the parents to know that everything's cool.
WM	Perfect. And then, cause I, by the way I've hadI've had a ton of kids friends who's, uh, friends who's kids have gotten in already to all these schools. It's amazing how, you know, they'll take them as early as sophomore years you know in these sports programs now where they tell them they're in.
RS	Well yeah but they're not really in. So they de-committ them, you know that. Eighty percent
WM	Oh I didn't know that.
RS	Decommit rate.
WM	WowSo these kids all think they're in, and then they may not be.
RS	They're not. They're not. Especially, especially if it's a girl.
WM	Yep.
RS	Because they recruit the girls early and what happens is
WM	It is girls, these are friends of ours who's girls have said no they were admitted to like all these top schools as like sophomores.
RS	And they weren't admitted.
WM	Wow.
RS	Nothing's happened. It's not a commitment, it's not a for sure thing, as them "Do you have it in writing?" and they'll say no.
WM	Wow.
RS	Because it's not in writing.
WM	Fascinating.
RS	So they all take themselves off the market. And then
WM	Yeah, totally well and they also stop worrying about their grades cause they're

	already in.
RS	That's right and they're notand they're
	not inbecause they have not done their
	applications. They have not
WM	That's actually terrible, they shouldn't be
	doing that.
RS	Well, what happens is it's because the
	parents have been pushing this for soso
	hard
WM	Yeah.
RS	And they want to be able to tell their
	families they got in here and here. So
	what happens is the 10 th grade girl
	commits and then what happens is she
1000	doesn't get any better.
WM	Yup. Yup.
RS	And now the kid who grows later and
WM	gets better later
VVIVI	And the kid who's hungriercause they
	don't think they've got a shoe in yet.
RS	They're still fighting. And trying and, yeah. That's exactly right.
WM	Wow. So, soum, I had an exchange, I
VVIVI	forwarded you that email. I had an
	exchange with uh, with um,
	the Dean over at the academy, and she
	was very positive about him. He still has
	to get obviously get hishe's gotta
	actually do the work on his pitch. Uh
RS	Right.
WM	Which I think he's got a pretty clever
	concept, but he'she's sorta needing to all
	the work to put it into a compelling, you
	know, package. He's gonna run that by
	when. he meets you next by the
	wayUmuh
RS	And he sent me stuff already, I just sent
	him back edits.
WM	Perfect. For his application?
RS	Yeah.
WM	Yeah that's on the general application
	right? No the um
RS	Correct.
WM	I don't think he's done with the pitch yet.
RS	No.
WM	I mean he's he's gettinguh, he's doing
	graphic design, getting you know, uh,

RS WM RS	screenshots doneand he'syou knowa guy, a blockchain guy helping him. AndI think he'll do a good job but we'll see. Um, but that's on the academy side so either way we can target getting him in, and then he can get in or not on the academy beyond that. Right. So Perfect. So you know essentially she told me when I get all the paperwork together, and I gotta create this profile pic. So what
	I'll probably need if you guys have any pictures of him, um playing multiple sports or something where you can kind of see his face a little bit in action?
WM	Umhm.
RS	It would be helpful because I will photoshop him onto a kicker.
WM	(laughs) Ok. Ok. Let me look through what I have. Pretty funny. The way the world works these days is unbelievable.
RS	It's totally cralike last year I had a boy who did the water polo, and when the dad sent me the picture, he was way too high out of the water. That nobody would believe that anybody could get that high.
WM	Yeah (OV)
RS	So I told that dad. I said "What happened?" He saidhe was standing on the bottom! I said "No no no no no."
WM	Yeah exactly. You gotta be swimming. Exactly.
RS	That's right.
WM	That's funny. That's great. Ok well yeah, it's too bad that she doesn't have a uh lacrosse program with scholarship positions. That'd be easy.
RS	I know. It'd be much easier. But she said, that's cool, let's do it that way. So, that's the path we're gonna go.
WM	Okay perfect. And then what are you sense of the odds at this point if we, once you get the package in and everything?
RS	Uh, 90%.
WM	Ok. Great. Great. Well, I'll get you some photos and um, obviously I'll see you on

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WM Umhm.		
RS That the caliber		
WM Which I which I findI I find hilarious	WM	
cause there's no easier program to get		cause there's no easier program to get

	through than Brown. Frankly it'll be alot easier than SC, academically.
RS	Right.
WM	I mean it's it's the most grade inflated program in the country. They call them gentlemen's B. I mean you don't have to do anything and you get a B.
RS	(laughs)
WM	You know? So I I I think it's I I think I think he would be surrounded by people that are generally more academic than he is. But you know, his his uh his actually ability to perform when he actually knuckles down is great (OV)
RS	Oh it's great
WM	And he can actually focus. He has a hard time focusing obviously but when he does it's it's he's plenty bright enough to be in that crew. (OV)
RS	He has grown up a lot
WM	So I would hate
RS	Righthe's grown up alot.
WM	What's that? No he has, it's amazing how he's changing. I mean it's almost like his frontal lobes grew or something yeah.
RS	(UI) But here's the other thing, uh, I just sent do you know?
WM	Uhh I feel like I do, why do I know that name?
RS	She used to run took over . , she just
WM	Yeah I I I actually just met with her. What a weird coincidence. With her and her boss.
RS	Ok so, so, I have kids of course. She's dropping off the oldest right now but they just got done meeting the president at Brown
WM	Uh huh.
RS	Because if you're gonna do this, I know you have the two, but him being in front of her is important just so that she knowscause she knows him and pushes everything through. If that's what you guys end up
WM	So so so, these guys said the same thing. And I, and she's quite excited about

RS	what we're doing and wants to meet. II worry a little bit that she wants to meet because of uh, she wants to sit down with me as opposed to having any desire to meet But uh you know, they they were suggesting I go and have dinner with and her, or lunch, with you know Another Yep. (OV)
WM	Um, my worry is I don't want to lean on
	these guys. I'd love your wisdom on this. But I don't want to lean on these guys cause I can certainly (OV) do that and push and pry them with a big donation (OV) and stuff but if doesn't want to go there anyway. And by the way he doesn't have to apply early, in fact they they said that they probably shouldn't apply early to Brown (OV), cause he's not you know, one of those candidates.
RS	No theyand they defer everybody. So let's wait for that for December January. (OV) If we don't have the letter by then. And and then you go. But I, that is the path because, and you're right, she wants to meet withlike wanted to meet with more than she wanted to meet with the two girls, and
WM	Yup.
RS	But I said , this is what you gotta do.
WM	Yep.
RS	And soso so yeah. I'd wait til December January.
WM	And do wewhen do you thinkwhat's the timing on the letter from, from SC, once we actually submit everything? (OV)
RS	So it either either comes in two waves. So it'll either happen sometime um midlate November or it'll happen, which I don't want to have happen, it'll happen on the next recruiting period, which will be January February.
WM	Umhm.
RS	My goal is to get his picture and everything into her now
WM	Yep.
RS	So that in that first wave we can get it

	done, so you can have it by Thanksgiving. Or earlier. Even before his application goes in.
WM	Perfect. Ok. Ok. Great. Alright, that would be good. Alright brother.
RS	Alright. Hang in there.
WM	I will see you Tuesday. Thanks for everything.
RS	Yup. You got it my friend. Take care.
WM	Ok yup bye bye.
RS	Alright bye bye.

Exhibit M

From: Rick Singer

Sent: Friday, April 22, 2016 2:51 PM

To: Mossimo Giannulli

Cc: Lori Giannulli

Subject: Re: new address

If you want SC I have the game plan ready to go into motion. Call me to discuss-

all me to discuss-

Sent from my iPhone

On Apr 22, 2016, at 9:46 AM, Mossimo Giannulli wrote:

Rick,

We just met with "'s college counselor this am. I'd like to maybe sit with you after your session with the girls as I have some concerns and want to fully understand the game plan and make sure we have a roadmap for success as it relates to and getting her into a school other than ASU!

Thanks,

M/.

Mossimo Giannulli



On Apr 22, 2016, at 9:43 AM, Rick Singer

wrote:

Terrific Thx

Sent from my iPhone

On Apr 22, 2016, at 9:31 AM, Lori Giannulli

wrote:

Hi Rick,

Our new address is

Best,

Lori

Exhibit N

From: Sent: To: Cc: Subject:	Mossimo Giannulli Friday, August 19, 2016 1:42 AM Rick Singer Lori Giannulli Re: USC
Fantastic. Will get all.	
Sent from cup and string	
	wrote: oday about I need a PDF of her transcript and test scores very soon while I create uld probably help to get a picture with her on an ERG in workout clothes like a real

> Sent from my iPhone

1

Exhibit O

From: Mossimo Giannulli

Sent: Wednesday, September 7, 2016 11:14 PM

To: Rick Singer

Cc:

Subject: rowing

Attach: IMG_4534.JPG; Untitled attachment 73432.txt



Exhibit P

From: Rick Singer

Sent: Tuesday, November 1, 2016 3:13 PM

To: Mossimo Giannulli

Subject: Re: Please send 50K payment to the person below

Yes

Sent from my iPhone

On Nov 1, 2016, at 10:56 AM, Mossimo Giannulli wrote:

For accounting purposes would I categorize this as a donation?

M/ Mossimo Giannulli





On Oct 29, 2016, at 9:36 AM, Rick Singer

wrote:

Donna Heinel Senior Womens Associate Atheltic Director c/o of USC Athletics



Check should be made out to USC Athletics

Please let me know when sent

Exhibit P-1

From: Mossimo Giannulli

Sent: Tuesday, September 27, 2016 6:18 PM

To: Lori Giannulli

Subject: Fwd: USC Admissions

The nicest I've been at blowing off somebody.

Mossimo Giannulli

MossimoGiannulli

Capo



Begin forwarded message:

From:

Subject: RE: USC Admissions

Date: September 27, 2016 at 11:10:13 AM PDT

To: Mossimo Giannulli

That's great! If you'd ever like to discuss the impact your philanthropy or participation in our mentorship programs might have on our students and community, please let me know. Alumni support of cancer research, climate science, social justice programs, and the arts and humanities, among other areas, is critical.

Here's an interesting video on the Renaissance Scholars program, inspired by da Vinci: https://dornsife.usc.edu/videos/featured/141/renaissance-scholars/. I think you'll find it interesting.

Best,



1

THE
CAMPAIGN
for the
University
of Southern
California

PAS REGNA TROJAE

From: Mossimo Giannulli
Sent: Tuesday, September 27, 2016 10:57 AM

To:

Subject: Re: USC Admissions

She will be applying. I've been to the school a few times and have some folks that keep me abreast of the latest and greatest!

Thanks for reaching out,

M/

Mossimo Giannulli

MossimoGiannulli

Capo

Modern Amusement®

On Sep 27, 2016, at 10:53 AM, wrote:

Thanks for the quick reply, Mossimo. I'm glad to hear that you're all set. Will she indeed be applying?

On another note, would you be interested in connecting to discuss your own involvement with USC? So much has changed since you were a student. I'd love to be able to update you on the amazing stuff that's happening. How about meeting in your area on Oct. 3^{rd} , 4^{th} , or 5^{th} ?

Best,



2

<image001.png>

From: Mossimo Giannulli

Sent: Tuesday, September 27, 2016 10:49 AM

To:

Subject: Re: USC Admissions

Thanks so much, I think we are squared away.

Best, M/

Mossimo Giannulli

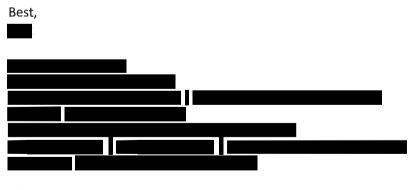
<image002.jpg>

On Sep 27, 2016, at 10:47 AM, wrote:

Hi Mossimo,

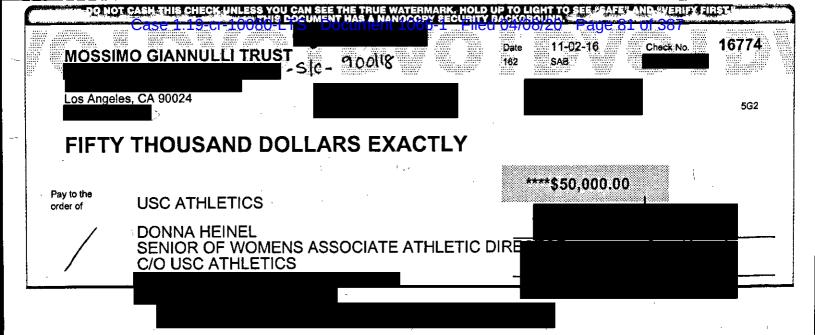
It's been a while and fall has now arrived so I just wanted to check in and see if your daughter is continuing with the admissions process at USC. I know when we last connected you mentioned she was a junior so I imagine she'll be submitting her application this fall. Please let me know if I can be at all helpful in setting up a 1:1 opportunity for her, customized tour of campus for the family, and/or classroom visit? I'd also be happy to flag her application.

I look forward to hearing from you.



<image001.png>

Exhibit Q



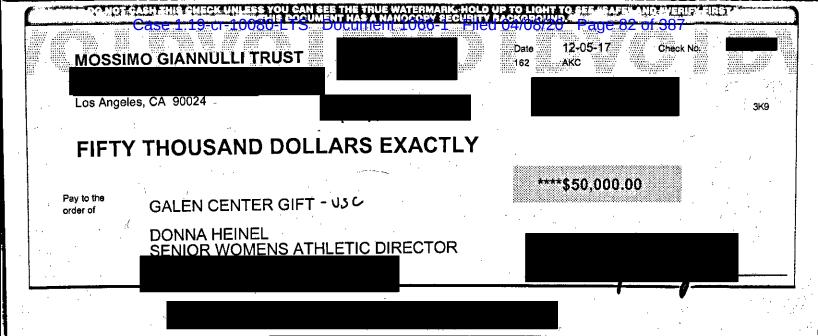


Exhibit R

From: Rick Singer

To: Mossimo Giannulli ;Lori Giannulli

Sent: 11/28/2016 10:11:40 PM

Subject: Fwd:

Attachments: pdf

FYI attached is the letter you can hold on to. As long as doers what she is doing all is good.

----- Forwarded message -----

From: **Donna Heinel**

Date: Mon, Nov 7, 2016 at 11:21 AM

Subject:

To: "

Here you go...

Donna C. Heinel Ed.D

Senior Associate Athletic Director/SWA

Associate Professor-Rossier School of Education

University of Southern California

CONFIDENTIALITY NOTICE: This communication and any documents, files, or previous e-mail messages attached to it, constitute an electronic communication within the scope of the Electronic Communication Privacy Act, 18 USCA 2510. This communication may contain non-public, confidential, or legally privileged information intended for the sole use of the designated recipient(s). The unlawful interception, use, or disclosure of such information is strictly prohibited under 18 USCA 2511 and any applicable laws.

OFFICE OF ADMISSION



November 4, 2016



Congratulations! I am pleased to inform you that the Admission Committee, after careful review of your credentials, has approved your admission to the University of Southern California for the fall 2017 semester. Your records indicate that you have the potential to make a significant contribution to the intercollegiate athletic program as well as to the academic life of the university. I can assure you that the faculty and staff will do all that we can to support you in achieving your goals as a student-athlete at USC.

Please be advised that this letter of acceptance is based upon a preliminary review of your academic records. In order to validate this acceptance you must:

- Complete in full an Undergraduate Application by January 15, 2017.
- Send official college entrance exam scores (SAT or ACT) to USC directly from the appropriate testing agency.
- Register with the NCAA Eligibility Center.
- 4. Meet all NCAA test score and core course initial-eligibility requirements.
- Send USC a final, official transcript which verifies high school graduation by August 1, 2017.
- 6. Avoid academic and behavioral misconduct.

If these conditions are not met, your approval will be revoked.

On behalf of the university, I would like to express our pleasure with your commitment to USC. We are delighted to welcome you to our community of scholars and to our athletic program. We look forward to seeing you on campus next year.



TEB: akb

Exhibit S

From: Mossimo Giannulli

Sent: Monday, April 10, 2017 4:12 PM

To:

Subject: Fwd: Invoice 1132 from The Key Worldwide Foundation

Attachments: Moss e-sig.jpg; ♦; Inv_1132_from_The_Key_Worldwide_Foundation_9272.pdf; ♦

Good news my daughter is in SC.... bad is I had to work the system.

M/

Mossimo Giannulli



> Begin forwarded message:

>_

> From:

> Subject: Fwd: Invoice 1132 from The Key Worldwide Foundation

> Date: April 10, 2017 at 9:00:08 AM PDT

> To: Mossimo Giannulli

>

>

> Sent from my iPhone

>

> Begin forwarded message:

>

>> From: "Steve Masera"

>> Date: March 30, 2017 at 7:43:30 AM PDT

>> To:

>> Cc:

>> Subject: Invoice 1132 from The Key Worldwide Foundation

>>

>> Hello Mossimo and Lori,

>> Thank you for your pledge to The Key Worldwide Foundation. Your pledge is now due and our courtesy invoice is attached to this email. Wire instructions are on the invoice and in the body of this email.

1

Begin forwarded message:

Prom: "Steve Masera" Date: March 30, 2017 at 7:43:30 AM PDT To: Cc: Subject: Invoice 1132 from The Key Worldwide Foundation Hello Mossimo and Lori, Thank you for your pledge to The Key Worldwide Foundation. Your pledge is now due and our courtesy invoice is attached to this email. Wire instructions are on the invoice and in the body of this email. Our receipt letter will go out to you upon full payment. Thank you both. Wire Instructions: The Key Worldwide Foundation Routing #: Account #: Swift Code: Bank Information: Tax ID: Steve R. Masera The Key Worldwide Foundation		from my iPhone forwarded message:
Thank you for your pledge to The Key Worldwide Foundation. Your pledge is now due and our courtesy invoice is attached to this email. Wire instructions are on the invoice and in the body of this email. Our receipt letter will go out to you upon full payment. Thank you both. Wire Instructions: The Key Worldwide Foundation Routing #: Account #: Swift Code: Bank Information: Tax ID: Steve R. Masera		Date: March 30, 2017 at 7:43:30 AM PDT To: Cc:
Thank you both. Wire Instructions: The Key Worldwide Foundation Routing #: Account #: Swift Code: Bank Information: Tax ID: Steve R. Masera	7	Thank you for your pledge to The Key Worldwide Foundation. Your pledge is now due and our courtesy invoice is attached to this email. Wire instructions are on the invoice and in the body o
Wire Instructions: The Key Worldwide Foundation Routing #: Account #: Swift Code: Bank Information: Tax ID: Steve R. Masera	(Our receipt letter will go out to you upon full payment.
Routing #: Account #: Swift Code: Bank Information: Tax ID: Steve R. Masera	7	Thank you both.
Account #: Swift Code: Bank Information: Tax ID: Steve R. Masera	١	Wire Instructions: The Key Worldwide Foundation
Swift Code: Bank Information: Tax ID: Steve R. Masera	F	Routing #:
Bank Information: Tax ID: Steve R. Masera	F	Account #:
Tax ID : Steve R. Masera	5	Swift Code:
Steve R. Masera	E	Bank Information:
	٦	Tax ID:
The Key Worldwide Foundation	9	Steve R. Masera
	7	The Key Worldwide Foundation

The Key Worldwide Foundation					
		***************************************			aanaaanaan
Bill To					
Mossimo & I	ori Giannulli	i			

Invoice

Date	Invoice#
3/30/2017	1132

Description		Amount
Private Contribution - Letter of receipt will be provided upon payment.		200,000.00
Wire Instructions: The Key Worldwide Foundation		
Routing #:		
Account #:		
Swift Code:		
Bank Information:		
Tax ID:		
501c3 FEIN	To	s 200,000.00

PM-00000706

Exhibit T

From: Rick Singer

Sent: Sunday, July 16, 2017 5:23 PM

To: Mossimo Giannulli;Mossimo Giannulli;Lori Giannulli

Subject: For Me to build an athletic profile for USC -

High School -

Cumulative unweighted and weighted GPA & test score (SAT or ACT and Subject Tests if available) Home Address Email phone number Parents Birthdate

If they play the sport- Crew Position - Coxswain Club - LA Marina Accolades if they have them Action Picture

Exhibit U

Case 1:19-cr-10080-LTS Document 1066-1 Filed 04/08/20 Page 93 of 387

From: laura janke To: Rick Singer

Sent: 8/6/2017 11:58:11 PM

Subject: Re:

I need all the other information on her so I can finish her resume and add a rowing club to her profile based off where she lives.

On 28 July 2017 at 11:11, Rick Singer

wrote:

Sent from my iPhone

Begin forwarded message:

From: Mossimo Giannulli

Date: July 28, 2017 at 10:47:22 AM PDT

To: Rick Singer

Cc: Lori Giannulli

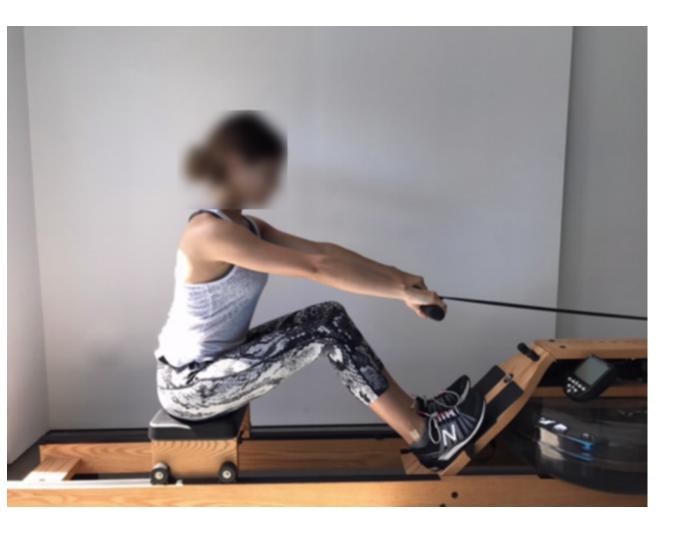


Exhibit V

Sent from my iPhone

Begin forwarded message:

From: Mossimo Giannulli

Date: July 28, 2017 at 10:47:22 AM PDT

To: Rick Singer

Cc: Lori Giannulli

Sent from cup and string

Exhibit W

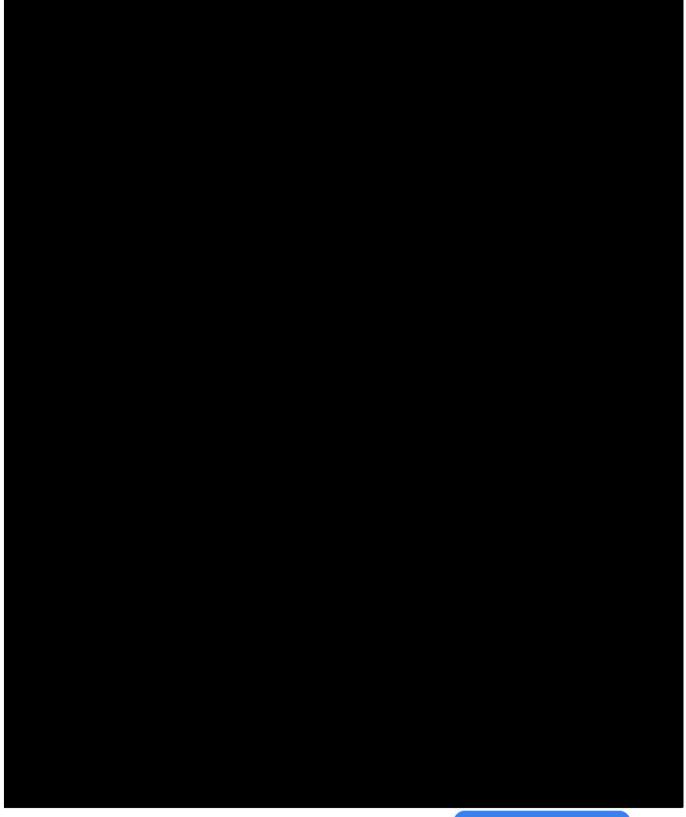
Mossimo Giannulli From: Wednesday, November 29, 2017 7:21 PM Sent: To: Rick Singer Lori Giannulli Cc: Re: USC Subject: **Attachments:** Moss e-sig.jpg Will get this handled this week. M/ Mossimo Giannulli > On Nov 29, 2017, at 11:10 AM, Rick Singer wrote: > Mossimo can you send a 50K check to USC and the address is below. Additionally the rest of the 200K will be paid to our foundation a 501 3C after receives his final letter in March. > > Made Payable to: > USC Womens Athletics > Send to: > Donna Heinel > Senior Womens Athletic Director > Please confirm when sent > Rick Singer

1

PM-00000293

Exhibit WW-1

Messages - Marcy



Rick was amazing though.

Glad we stumbled on him

Oh really... so you liked "who the fuck does he think he is??!!!" Rick. You'll be great working with him. I forgot. Best thoughts!!

We did not pay your price. That was ridiculous

You were sworn to secrecy!!!!!! Do not tell a soul!!

But I can only think the money was spent wisely for school or else wise

I don't think most of it went to the school between us only

Please never ever repeat anything.

Ya of course. I'm so excited for

And he is so happy!!!

I worry you're going to blurt this out. Swear you did not tell

That is all that's inprotant

Keeping it confidential is just as important to me.

I told no one else.. no one other than one cousin.

Rick is the kid whisperer.

That's what my cousin calls him

Of course. You should know our kids talk

Still

And my son knows ZERO!!! Zero. That's why I don't want anyone to know.

I'm happy they are close. But I pray you didn't tell



You're not replying and that makes me nervous.

I'm sorry, I have to be honest. She does know that Rick "helped"... like a college counselor should

Did you discuss money with her?

He has helped her as well

Messages - Marcy

We don't have a lot of secrets here. She has been an integral part of all discussion. Start to finish. Whatever you do with is your business. I told no one about us for a VERY big reason. Sounds like you shared that with or around her I found rick on my own He brought your name up in his own On Not to mention many others I told you about rick before you met him through s contact. Bottom line is I shared a highly confidential secret with you never to be repeated. I don't care what you do but that was a big deal to ME He is the one who brought up all the families he's working with. I had no idea. He is welcoming business was a part of the first pricing/strategy convo (on speaker Listen. with and I). He brought up bc of how close we live. talked about how close she is to And we (and I) said and I) said we weren't prepared to pay that price. Things went through as follows

My son knew zero. Zero.Other than Rick had connections. What you tell your child is up to you, but I shared a highly highly confidential secret with you that was only mine to ever tell. Of course I wanted you to work with Rick!! That is insane. But most of the families I know contributed big time. We donated a lot while was in and to and and to what we do. This was different and again, only mine to share. I was under the clear impression from people we know well that Rick has a very high threshold and shared that with you. Best of luck, I'll be thrilled for her wherever each of the share of the s

This wasn't about about me asking you to not ever say anything.

Oven before that talking about pricing we had no idea RICK was your guy!

1/10/19, 12:00 AM

That's not the point. I shared what was to me a huge secret with you about the money and you shared it.

Rick is simply not as exclusive as u think

That's not the point here. It's about you and me, not Rick

I stumbled on him. When I found out he was you guy.., of course the questions arose

Are u on a plane?

I see u typing. Can u talk?

Keep telling yourself that's the bigger question. You betrayed a big secret of mine. You've been a highly trusted friend. I don't play games. I told you what I new to be true and stand by it 100%.

You told me introduced you. It doesn't matter at all to me. I hoped would get in a fabulous school. But what I told you was not to be shared.

Marci- when I found out he was your guy i wanted to let him kno right away that we were not going to be able to follow suit

My flight is taking off. I'm crushed you betrayed this confidence to anyone. There are discussions that can take place without others present. It's too late now but I don't trust easily.

Well whatever, I don't trust easily either.

We need to talk..

1/12/19, 11:02 PM

I think about you everyday. Our convo is not finished. Rick is one to be discussed. Ive gone back to analyze our text ... about a 100times!!! I promise it's not what you think.

Where the are u?

I meant, where are u? Sorry if it came of slang...

Exhibit X

726 Page 1

- 1 Call Date: 2017-12-04
- 2 Call Duration: 1:17
- 3 Call Begin [] Call End []
- 4 Call Participants:
- 5 Donna Heinel
- 6 **File Name:** 726
- 7 Bates No.:
- 8 HEINEL: [00:00] Hey, Rick, it's Donna. Uh, I got to talk to
- 9 you pretty quickly. Uh, I need some of those checks
- 10 written to a, uh, a different way. Uh, so if you could,
- 11 uh, stop. But for the
- rest of the people that owe money, uh, could you please,
- 13 uh, I need it to go to Galen Center, uh, gift account.
- 14 Uh, it just makes it better. So if they've already
- written the check, uh, when I get it I can tear it up.
- And if they could issue a new one. But everything is --
- 17 has to go to, uh, Galen Center gift account. OK? Uh,
- 18 call me with any issues. And I think we're going to do
- that with (sp?) [01:00] too and that could be a
- 20 1, uh, that would be a 1 check going to Galen Center.
- 21 Uh, gift account. All right? For 200,000. All right,
- 22 thanks, bye-bye. [01:17]

END OF AUDIO FILE

1

From: Rick Singer

Sent: Tuesday, December 5, 2017 12:19 AM

To: [Mossimo Giannulli (owner)]"

Subject: [Chat #71922]

Please send your USC check to Donna Heinel and the same address but instead of Women's Athletic Board please make out to the Galen Center Gift Account Please confirm

----METADATA INFORMATION-----

Device Owner:

Mossimo Giannulli

ICCID:

Exhibit Y

From:	
Sent:	Tuesday, January 30, 2018 2:25 AM
To:	
Subject:	Fwd: Invoice 1166 from The Key Worldwide Foundation
Attachments:	Inv_1166_from_The_Key_Worldwide_Foundation_9516.pdf; �
FYI	
Sent from my iPhone	
Begin forwarded message	:
> From:	
> Date: January 29, 2018 a	at 2:26:59 PM PS1
> To: > Cc:	
	om The Key Worldwide Foundation
> 5dbjeck invoice 1100 inc	The key Worldwide Foundation
> Dear Mossimo & Lori Gia	annulli,
>	,
> Thank you for your gene	erous donation.
>	
> Our courtesy invoice is a	attached hereto and contains wire information should you prefer to wire the funds.
>	
> Thank you again,	
>	
>	
> 	
> The Key Worldwide Fou	ndation
> The Key WorldWide Foul	
> Sacramento, CA 95825	
>	
>	
>	
>	

The k	ey Worldwi	de Foundation	31.272
	,		
Bill To			
Mossimo d	. Lori Giannulli ■		<u>2222</u>

Invoice

Date	Invoice #
1/29/2018	1166

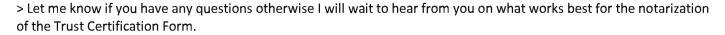
Description		Amount
Private Contribution - Letter of receipt will be provided upon payment.		200,000.00
501c3 FEIN	Total	\$200,000.00

Exhibit Z

From: Sent: To: Subject: Attachments:	Mossimo Giannulli Tuesday, February 6, 2018 4:58 PM Re: Merrill Lynch Transfer Update Moss e-sig.jpg
Rick Singer may also work.	
Mossimo Giannulli	
G/FORE	
> To:> Subject: Re: Merrill Lynch Transf> Matt was gone this am and left>	Fer Update word. Happy to send and send back when I receive.
> Also the last college "donation" > > > > > > > > > > > > >	for Can't I write this off?
>	1

PM-00000146

>
>
> G/FORE
>
<u>></u>
>
> <image001.jpg></image001.jpg>
> \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
> -
> On Feb 2, 2018, at 10:10 AM,
wrote:
>
> Hey Moss,
>
> Just a quick update on where we stand and what I still need. First, your trust account at UBS has you listed as Trustee and not is only trustee of the standard (so I need to send you a trust certification form that needs to be notarized. Can I UPS the form to your work address for Monday delivery and can I also schedule a mobile notary to meet your office to do a quick 10 minute signing? Any day is fine as long as you give me some lead time to schedule the notary. Let me know what would work best for you.
> Second, I still need these documents from UBS as well as them setting up duplicate statements going forward so I don't have to bother you every month. UBS is requiring that you call to request these be sent to me. can be reached at
> 1.) Copy of your Dec 31st UBS Statement > 2.) Copy of your Jan 31st UBS Statement
 > 3.) Copy of the Dec 31st 529 Account Statements > 4.) Copy of your December 31st performance report (PMR Report) both for the personal accounts and the 529 accounts.
> 5.) Request that duplicate statements be sent going forward to
>
> All of the above UBS documents can be sent direct to me via secure email.
>
2





- > This message, and any attachments, is for the intended recipient(s) only, may contain information that is privileged, confidential and/or proprietary and subject to important terms and conditions available at http://www.bankofamerica.com/emaildisclaimer < http://www.bankofamerica.com/emaildisclaimer >. If you are not the intended recipient, please delete this message.
- > This message, and any attachments, is for the intended recipient(s) only, may contain information that is privileged, confidential and/or proprietary and subject to important terms and conditions available at http://www.bankofamerica.com/emaildisclaimer < http://www.bankofamerica.com/emaildisclaimer >. If you are not the intended recipient, please delete this message.

Exhibit AA

Development N/A	Date: Access:	May 23, 2017 2:35 PM private
	Access:	private
N/A	Date: Access:	March 10, 2017 10:16 AM private
Scheduling	Deter	March 40, 2047 40:40 AM
N/A	Access:	private
Scheduling	Date:	March 2, 2016 2:01 PM
N/A	Access:	private
	Date:	September 12, 2015 10:59 PM
Notes		
ournal Notes:		
lank		
arent Questionnaire:		
ank		
Questionnaire:		
ee Attached		
Survey:		
ank		
esume:		



4/12/2018 – I received a call from the front desk that Mr. Giannulli was downstairs looking for our Head of School, who was off campus, and wanted to talk to me. I had a feeling this was regarding the conversation I had with the day before. I had not seen Mr. or Mrs. Giannulli in my office since we had our family meeting for two years prior. I went down to receive him and bring him upstairs to my office. While we were headed to my office I asked if he had walked over or drove, they live very close to campus. Mr. Giannulli replied, "What does it matter?" in a curt tone. I said I was just making conversation, he replied, "Let's not." When we sat down in my office he aggressively asked what I was telling USC about his daughters and why I was trying to ruin or get in the way of their opportunities. I asked him to clarify what he meant.
Mr. Giannulli backed up and asked what I had told USC in 2017 about His tone made me visibly nervous. I told him that I had conducted a routine counselor call with USC, I was informed that was identified and admitted as a recruited athlete for crew, had replied that I had no knowledge of being a rower, but did not in any way contest her admission decision. He then asked if I had said was not a good admit for USC and said she was currently thriving at USC. I told him I was happy to hear that, but had never told USC she was a bad candidate for admission, just that I had no knowledge of her being a rower.
It was around this time that my Co-Director of College Counseling,, came in from her office next door to close my office door because our voices were carrying down the hall.
Mr. Giannulli then had me recount what I had told USC about I told him I conducted the same routine counselor call with USC a few weeks prior, they had identified as a recruit for crew too, and I said I had no knowledge of her involvement as a rower. Mr. Giannulli then interrupted and bluntly stated that was a coxswain. I told him I was unaware of that and I would have to inform them. He then asked about my conversation with USC the day before. I told him that USC had called me to inquire about an independent counselor who was seemingly making false claims about applicants' athletic involvements to leverage positive admission decisions for them.
Mr. Giannulli then went into an agitated stream of consciousness stating he could not believe I had put admission to USC at risk in 2017 and how annoyed he still was that I could not combine her grades with grades for a recalculated GPA on her transcript. (This is not the practice of or any other private school I know of; only classes taken at the school which generates the transcript appear on that transcript. A separate transcript from each high school attended is sent to the colleges to which a student applies.) Mr. Giannulli said he let that go though, but was astounded when I had endangered sadmission to USC this year. He then said had no idea about this situation and would be crushed if she had any knowledge of it. He then asked me if I had any idea who was and what she had going for her. I told him I was well aware of her YouTube channel and video blogs regarding style, make-up and fashion. I then went on to affirm that I had been a champion for and if he were to read my letter of recommendation he would

see that I portrayed as a guru in her field with a bright future and any school would be happy to have her.

Mr. Giannulli went on to say he still did not "get it," I was his daughters' counselor, I was supposed to help them. He then stated he "knows lots of people" and had delivered a couple admits for me to include on my school profile that I would not have had otherwise, and asked why would I want to negate that by talking to USC negatively about his daughters. I then firmly stated that I had not done any such thing, I had not put his daughters in jeopardy, and insinuated that the person presenting them as rowers had done that. Given Mr. Giannulli's angered state I did not want to say that outright making an accusation. Mr. Giannulli still pushed on why I acted as I had and I stated that "it was my job to ensure there is integrity in this process," referring to the college admission process. I have my professional reputation, that of and of every past or future graduate on the line when I make a statement or claim.

Mr. Giannulli then asked what I was going to do now, I told him I was going to have to contact USC to let them know he had told me that was a coxswain. He stood up, shook my hand and walked out.

I immediately reached out to	to let her kno	ow about t	he interaction I jus	t had with
Mr. Giannulli. had me contac	t our Athletics Depar	rtment to l	ook for records of	either
Giannulli girl being a rower, we had	none. I then also trie	ed to call	at USC, h	e was
unavailable, so I emailed him saying	I had new information	on about	Giannulli.	called
me back after an event concluded, 3	0-40 minutes later.	I told	that Mr. Giannulli	paid me a
visit that morning concerned about	his daughter	admission	status at USC and	to affirm
to me that was a coxswain. I a	asked how the fa	amily may	have known about	what was
transpiring or being questioned in hi	is office. said he	e had emai	led his supervisors	about the
situation and they may have passed	it on to Athletics. M	iaybe Athle	etics had informed	the family
or someone else who had told the fa	amily.			

After that phone call with I emailed Mr. Giannulli to let him know: I had spoken to USC and shared what Mr. Giannulli had told me earlier about being a coxswain, to assure Mr. Giannulli that admission to USC was never in danger, provide him with contact information if he had any other questions. I received a quick reply saying, "Thank you very much."

Email Records: See Attached

Exhibit BB

From: Mossimo Giannulli Thursday, April 12, 2018 3:15 PM Sent: Rick Singer To: and USC Subject: Fwd: Here we go..... Mossimo Giannulli Mossimo Giannulli Begin forwarded message: From: Subject: and USC Date: April 12, 2018 at 12:08:35 PM PDT To: Mossimo Giannulli Cc: Mr. Giannulli, I wanted to provide you with an update on the status of sadmission of sadmission and were satisfied by the sadmission and were 's admission offer to USC. surprised to hear that was even a concern for you and your family. You can verify that Senior Assistant Director of Admission and the representative for the last five years: , if you would like. I also shared with that you had visited this morning and affirmed for me that truly a coxswain. Again, I think so highly of all that has done as a student and entrepreneur. I know USC will only add to her success and she to the Trojan Family. Best,



Exhibit CC

From:		
Sent:	Thursday, February 28, 2013 1:40 PM	
To:	Rick Singer	
Subject: RE: Potential trip - meet coaches if possible		
	still available for USC – should we decide before our Easter trip. It would be such a shame to lose it because ecide fast enough.	
Sent: Tues To: John W Cc:	Singer [mailto day, February 12, 2013 6:44 AM ilson e: Potential trip - meet coaches if possible	
	tion as now one slot first come first	
Sent from:	<u></u>	
On Feb 12	, 2013, at 6:42 AM, "John Wilson" wrote:	
R		
Thx	- how would that change in two years?	
Sent	from my iPhone	
On I	Feb 12, 2013, at 3:39 PM, "Rick Singer" wrote:	
	Gpa ISC is 3.8 plus and 1950+ is low solid burnout where near for sure on his own. Jovan is giving me 1 boys slot and as of yet no one has stepped up to commit that is why it is later	
	Sent from my iPhone	
	On Feb 12, 2013, at 1:57 AM, "John Wilson" wrote:	
	R	
	Thx. 1 thought the USC deadline was much earlier.	
	Also, what is chance of USC or BC if he goes to Europe for two years at international school and gets 3.4 and 1900 SATs?	
	Thx	
	J	
	Sent from my iPhone	

USC and BC by mid July. USC 95 percent chance- BC 50 until I have a face to face and his test scores are in, Georgetown need very good grades and no more than one B this semester and 1950+ by mid June then depending on commitment 90 percent if all in -

Sent from my iPhone

On Feb 10, 2013, at 2:01 AM, "John Wilson" wrote:

Rick

What is the deadline to decide on side door for USC or BC or Georgetown etc this year? (Also pls confirm for which schools is side door option really viable)

Also, if went to school for two years and played club water polo there what is probability side door at USC or other locations would be a realistic option then?

John

Sent from my iPhone

On Feb 10, 2013, at 2:29 AM, "Rick Singer" wrote:

Spring Break Trip

Tuesday -- April 2nd -- USD & SDSU

Wednesday -- April 3rd -- LMU & UCLA

Thursday -- April 4th -- Pepperdine & OR UCSB

Friday -- April 5th -- Cal Poly

Rick Singer

Exhibit DD

From: To: Sent: Subject:	John Wilson < 3/27/2013 3:23:24 AM Re: John Wilson
	f he is playing so No- the commitment is to be on the roster not attend all practices but he will have to attend ther mandatory functions for 1 year then walk away/ frankly after the 1st semester he can move on
Sent from my iI	Phone
On Mar 26, 201	3, at 11:50 PM, "John Wilson" wrote:
R	
	s wondering if he did the side door at USC is it year round commitment ?for two years min? Or one? Will w team or stay home for road meets etc.
What would a b	ench warmer position mean? Would the other kids know he was a bench warmer side door person?
J	
Sent from my il	Phone
On Mar 27, 201	3, at 7:10 AM, "Rick Singer" < > wrote:
Smu TCU LMU	J, SDSU, uCSC, cal poly SLO CU Boulder, indiana, oregon arizona rollins
Harder- u miam	ni, Santa Clara, Usd, northeastern BU, GW u Wisconsin Tulane USC
Sent from my il	Phone
On Mar 26, 201	3, at 10:19 PM, "John Wilson" < wrote:
R	
-	and swimming are nit realistic for then What are the schools that he has a realistic shot at (without area, southwest and east coast?
Sent from my iI	Phone
On Mar 27, 201	3, at 12:26 AM, wrote:
I followed up w Xxoo	P/Rick about our school visits - I'll connect w/ tonight about finalizing the list.
Sent from my il	Phone
Begin forwarde	d message:

From: Rick Singer
The division3 schools are pitzer and chapman which he can get I and are considered lower level. Santa Clara is slightly lower than LMU in polo, UCSD is very academic and they would take but cannot help get in.
Jovan just texted me he will meet you all at 3:30pm on Tuesday on the pool deck. You will have to leave LMU early.
Sent from my iPhone
On Mar 26, 2013, at 2:38 PM,
Hi Rick, Did you & discuss the 2nd & 3rd tier schools that & his wpolo discussed? What schools would you suggest that we see while in S. CA next week? Thx
Sent from my iPhone
On Mar 26, 2013, at 2:17 PM, "Rick Singer" < wrote:
They are in the top 8 in the country. They want totally dedicated polo players - has to put in more time and decide he really wants to play or when they meet him they will be disappointed and make my relationship sour.
Please let me know if is going to be totally on board. LMU may be delayed if Jovan comes to campus to meet at noon on Tuesday as well.
Sent from my iPhone
On Mar 26, 2013, at 2:14 PM, "John Wilson" < wrote:
R
So, none of the teams really even LMU want to even meet with him on their campus?
Sent from my iPad
On Mar 26, 2013, at 22:09, "Rick Singer" < wrote:
There are no offices on campus at usc. I asked Jovan to come to campus to meet. At LMU they are not very interested in more get in and then we can speak same for others. I can ask again but be prepared for their outlook.
Sent from my iPhone
On Mar 26, 2013, at 1:27 PM, "John Wilson" < wrote:
Rick
These are generic tours? I thought we might be meeting w assistant water polo coaches etc.
John

Sent from my iPhone

All in tact. I sent an email to Jovan to see if he is on campus to meet.

----- Forwarded message -----

From: <

Date: Tue, Mar 26, 2013 at 11:27 AM Subject: John Wilson

To: Rick Singer

Itinerary for Wilson

Tuesday, April 2

- USC
 - 9:00 am Campus Tour
 - Confirmation Number: CT0402201309002101467310
 - Please arrive at least 15 minutes prior to the start of the program.
 - Driving directions and a campus map can be found on our website at http://web-app.usc.edu/maps/
- · LMU
 - 1:00 pm 2:30 pm Campus Tour
 - For directions to the campus, please click on the following link: Directions and Map

Wednesday, April 3

- UCSB
 - 12:00 pm Campus Tour, 3:00 pm Information Session
 - Find detailed directions and campus maps at: www.admissions.ucsb.edu/VisitUCSB.asp
- Upon arrival, be sure to purchase and display a parking permit in your vehicle. It is recommended that you select a daily permit rather than an hourly permit in order to maximize your time at UCSB and avoid parking citation should you decide to stay on-campus for lunch or to visit the bookstore.

Thursday, April 4

- USD
 - 1:30 pm Campus Tour
 - Tour Location: Admissions Office Serra Hall 201 University of San Diego,

Rick Singer

а

Exhibit EE

Wilson, John From: Sent: Saturday, August 24, 2013 11:20 AM To: Rick Singer **Subject:** Re: Update on applications Thx Sent from my iPhone On Aug 24, 2013, at 3:25 PM, "Rick Singer" wrote: > Will do > Sent from my iPhone > On Aug 24, 2013, at 5:14 AM, "Wilson, John" wrote: >> R>> >> Great - let me know when u have verified u have it all completed and into Jovan. Also when and where to wire money. >> >> Can u also pls help push on the core applications process (pls let us know which apps. e.g. common, USC, USD, BC etc. and where he stands on completeness - hasn't started, started essay. Everything done but essays etc thx) >> >> J >> Sent from my iPhone >> On Aug 24, 2013, at 1:24 PM, "Rick Singer" wrote: >>> I believe I have everything. Transcript test scores and a player profile so he can add to his recruit list and present him to admissions in October >>> Sent from my iPhone >>> >>> On Aug 24, 2013, at 12:16 AM, "Wilson, John" wrote: >>> >>>> R >>>> >>>> I meant i assumed that the applications are available. >>>> >>>> Sounds like some are. Balance over next 6 weeks. >>>> >>>> Worry keeps blowing things off. >>>> >>>> What does Jovan need by sept 20? Do u have what we need? Do I make the first payment to u then? >>>> >>>> J >>>> >>>> Sent from my iPhone >>>> >>>> On Aug 24, 2013, at 9:08 AM, "Rick Singer" wrote: >>>> Absolutely not. The apps became available at the beginning of August. The common is registered and uploaded to where it can be until meeting with tomorrow. Most all schools Siemens are not out till September 1-15. A final list of schools has to be prepared. I as stated in several other communications have never seen what he has done with Hopefully I will get it tomorrow. UC app not out till October 1. As they become available we will input but need to see for info and a final list of schools. Jovan is in Greece. He texted me yesterday that he wants "s material not app around September 20th." >>>> >>>> Sent from my iPhone

wrote:

>>>> On Aug 23, 2013, at 11:44 PM, "Wilson, John"

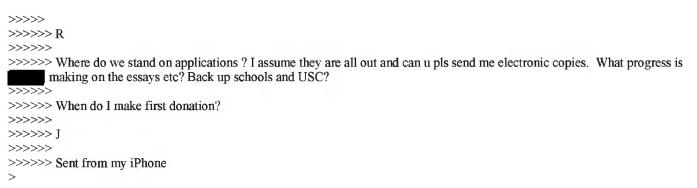


Exhibit FF

On Oct 13, 2013, at 8:46 AM, "Rick Singer" wrote:

Common application will be submitted between Dec 1-15th after next test dates and apps done. Jovan has 's stuff and asked me to embellish his profile more, which I am doing. ACT signed up for October 26th, SAT Nov 2nd.

On Sat, Oct 12, 2013 at 12:50 PM, John Wilson R

Hope all is well. I wanted to catch up on where the college app process stands (personal statement, USC, other essays, the total application status, when is taking the new SAT and ACTs etc. Is there a time we can chat today or tmrw?

John

Sent from my iPhone

Rick Singer

Exhibit GG

From: Rick Singer

Sent: Saturday, October 19, 2013 7:30 PM

To: John Wilson

Subject: Fwd: WILSON
Attach: WILSON.pdf

fyi

----- Forwarded message -----

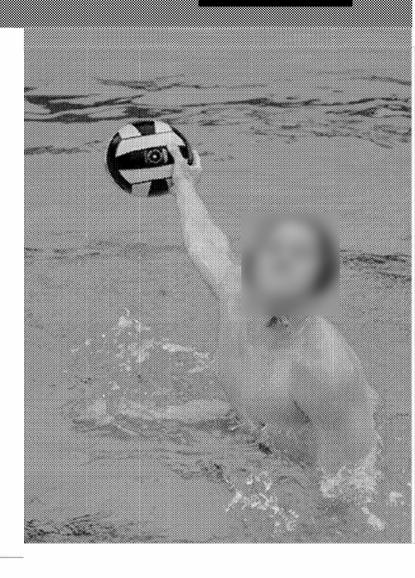
From:

Date: Sat, Oct 19, 2013 at 4:26 PM Subject: WILSON

Subject: WILSON To: Rick Singer

Rick Singer





Awards & Honors:

Water Polo

2010,2011,2012, 2013 -- Varsity Letterman 2011,2012,2013-- Co Captain Central Coast Section - 2011,2012.2013 All Section

Team

CCS - 2012 Offensive Most Valuable Player
California Scholar Athlete Award - 2011,2012, 2013
US National Water Polo Qualifier- 2013
Pacific Zone Water Polo Qualifier 2011, 2012, 2013
Junior Olympics Pacific Team 2010,2011,2012,2013
Asics National Sports Youth Leadership Council - 2012, 2013

Swimming

2010,2011,2012, 2013 Varsity Letterman 2011,2012, 2013 - Co Captain All American Swimmer - 2012, 2013 Central Coast Section - High Point Scorer- 2012 US Junior Olympic National Swimming Championships 6'1 / 180lbs
Position: Driver-- #6

Swimming Times -- 50 Freestyle 20.12 short course 100 Freestyle 43.98 short course

Water Polo

Water Polo Club

Exhibit HH

From: John Wilson

Sent: Wednesday, October 23, 2013 8:40 PM

To: Rick Singer

Subject: Re: quick q on spring/summer

R

Cc:

Thx we are encouraging to focus on water polo this spring and he will do and and club. (Not varsity swimming - As that requires him to skip all senior trips - off)

That way he can take senior trip to Spain for a week and also spend two weeks in the spring coming to Europe to visit w us.

I strongly prefer he plays as hard as he can and at least suits up and scrimmages w the team. Would it also make sense for him to try a week of camp at USC?

When would he need to start this August? Or September?

Sent from my iPhone

On Oct 23, 2013, at 3:12 PM, "Rick Singer" wrote:

Just be ready for practice in the fall as a player on the roster or just a member of the squad but not get in the pool. he has to be on the roster for a year one way or another.

On Wed, Oct 23, 2013 at 3:10 PM, John Wilson wrote:

R

What are the expectations if gets into USC thru this WP approach?

Does he have to play club in addition to club and or varsity swim team?

We want to know to start planning spring and summer commitments. His preference is to take senior trip for a week to Spain (which he can't do if he is on varsity swimming). He also doesn't want to do club this summer but would rather come to Europe and cape cod with us.

Is this going to be a problem? look bad?

john

<image001.jpg>

John B. Wilson Hyannis Port Capital

Rick Singer

Exhibit II

From: John Wilson Saturday, March 1, 2014 9:54 AM Sent: To: Rick Singer Cc: Re: USC fees Subject: R Awesome! **Hyannis Port** Capital, Inc C/O John Sent from my iPhone > On Mar 1, 2014, at 3:11 PM, "Rick Singer" wrote: > Yes we can send you an invoice for business consulting fees and you may write off as an expense. What is the name address etc you want the invoice to be made out to? > Sent from my iPhone

>> Thanks again for making this happen! Pls give me the invoice. What are the options for the payment? Can we make it for

consulting or whatever from the key so that I can pay it from the corporate account?

wrote:

>> On Mar 1, 2014, at 4:51 AM, John Wilson <

>> >> Rick >>

>> J >>

>> Sent from my iPhone

Exhibit JJ

From: Steve Masera

Sent: Tuesday, April 1, 2014 12:33 PM

To:

Subject: Requested Documents

Attach: scan0001.pdf

Good morning

Attached are the documents that we promised yesterday. Please send me your mailing address if you prefer hard copy. Best to you.

Steve

Steve R. Masera

Accounting



The Key Worldwide Foundation - FEIN

Date April 01, 2014



Dear John and

Thank you for your contribution of \$100,000.00 to The Key Worldwide Foundation. Your generosity will allow us to move forward with our plans to provide educational and self-enrichment programs to disadvantaged youth. We are very excited about the impact that these programs will have in the communities in which we will engage.

This letter shall serve as formal acknowledgement of your contribution or, for which no goods or services were exchanged.

The Key Worldwide Foundation, Inc., was incorporated in the State of California on December 14, 2012 as a non-profit, public benefit charitable organization and tax-exemption applications for recognition as 501(c)3 charitable status have been filed with the Internal Revenue Service and the California Franchise Tax Board. While we have been fully authorized by the state of California, we are currently awaiting final authorization from the Federal Government.

ponations received while the applications are pending may be treated as tax-deductible contributions to the extent allowed by law retroactive to the date of the organization's formation assuming the applications are approved. We do not foresee any reason why our applications will not be approved, but should there be any issue with the progress of our pending applications, we will immediately inform you.

We will forward you a copy of the formal letter from the IRS confirming the organization's status as a tax-exempt, 501(c)3 charitable organization as soon as we receive it.

Thank you again for your generous support of our new foundation.

Sincerely.

Steve Masera The Key Worldwide Foundation



Wire Instructions: The Key Worldwide Foundation

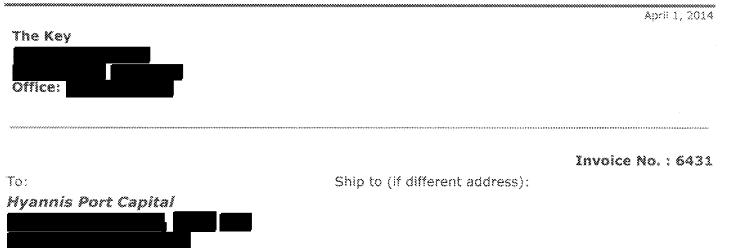
Routing #:

Account #:

Swift Code:

Bank Information: US Bank, Sacramento, CA 95825

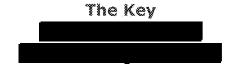
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888	voice
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Representative	Your P.O. No.	Date Shipped Shipped Via	F.O.B. Point Terms
Rick Singer			Due on Receipt

Quantity	Description Un Pri		Amount
	Business Consulting- August through June 2014		\$100,000.00
			0.00
			0.00
			0.00
			0.00
			0.00
			00.0
	Sui		0.00
	Sa Total Control of the	`ax	0.00
	Shipping Handli	; &	0.00
		tai	\$100,000.00

Make all checks payable to:



If you have any questions concerning this invoice, call:
Steve Masera,

Steve Masera,

Form (Rev. August 2013) Department of the Treasury

Internal Revenue Service

Request for Taxpayer Identification Number and Certification

Give Form to the requester. Do not send to the IRS.

	Name (as shown on your income tax return) The Edge College & Cover Network, U.C 1384 T	hekey
ĕ	Susiness name/disregerded entity name, if different from above	<u> </u>
s on page	Check appropriate box for federal tax classification: Individual/sole proprietor C Corporation S Corporation Partnership Trust/estat	Exemptions (see instructions):
Print or type	☐ Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P≈partnership) ➤	Exempt payes code (if any) Exemption from FAYOA reporting code (if any)
Print CHR	Other (see instructions) >	
Specifi		s name end address (optional)
See	City, state, and ZIP code	
	List account number(s) here topounary	
	Taxpayer Identification Number (TIN)	nnannan nananananananan nananananananan
to ave reside entitie	your TIN in the appropriate box. The TIN provided must match the name given on the "Name" line soid backup withholding. For individuals, this is your social security number (SSN). However, for a sent alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other as, it is your employer identification number (EIN). If you do not have a number, see <i>How to get a</i> an page 3.	ocial security number
	If the account is in more than one name, see the chart on page 4 for guidelines on whose ser to enter.	nployer identification number
	Certification	
000000000	r penalties of perjury, I certify that:	aaraan aaraa ka aa ahaa ka k
1. Th	e number shown on this form is my correct taxpayer identification number (or I am waiting for a number	to be issued to me), and
Se	m not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have no evice (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividenc Honger subject to backup withholding, and	t been notified by the Internal Revenue is, or (c) the IRS has notified me that I am
3. ia	m a U.S. citizen or other U.S. person (defined below), and	
4. The	e FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correc	ł,
	fication instructions. You must cross out item 2 above if you have been notified by the IRS that you are use you have failed to report all interest and dividends on your tax return. For real estate transactions, ite	

General Instructions

Signature of

U.Š. person ►

interest paid, acquisition or abar generally, payments other than i

instructions on page 3.

Sign

Here

Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. The IRS has created a page on IRS,gov for information about Form W-9, at www.irs.gov/w9. Information about any future developments affecting Form W-9 (such as legislation enacted after we release it) will be posted on that page.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TiN) to report, for example, income paid to you, payments made to you in settlement of payment card and trird party network transactions, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

- Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
- 2. Certify that you are not subject to backup withholding, or
- 3. Claim exemption from backup withhording if you are a U.S. exempt payer, if applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the

withholding tax on foreign partners' share of effectively connected income, and

contributions to an individual retirement arrangement (IRA), and

e certification, but you must provide your correct TIN. See the

 Gertify that FATCA code(s) entered on this form (if any) indicating that you are exempt from the FATCA reporting, is correct.

Note, if you are a U.S. person and a requester gives you a form other than Form W-8 to request your TiN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- . An individual who is a U.S. citizen or U.S. resident alien,
- \bullet A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or

Date >

A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax under section 1446 on any foreign partners' share of effectively connected taxable income from such business. Further, in certain cases where a form W-9 has not been received, the rules under section 1446 require a partnership to presume that a partner is a foreign person, and pay the section 1446 withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid section 1446 withholding on your share of partnership income.

Wiring Instructions: "The Key"

To: US Bank - Campus Commons Branch,

Acct. #: Routing #: Swift Code:

Rick Singer Invoice



-	Date	Invoice #
*	4/1/2014	110761

Bill To	
Hyannis Port Capital	

P.O. No.	Terms	Project

Quantity	Description	 Rate	Amount
	Special Consulting Income Planning and Consulting - August through June 2014	20,000.	20,000 00
		Total	\$20,000.00

Form (Rev. August 2013)
Department of the Treasury Infernal Revenue Service

Request for Taxpayer Identification Number and Certification

Give Form to the requester. Do not send to the IRS.

****		*****		****		*****	*****	****		
	hame (as shown on your income tax return) KICK W. Sillager									
	Business name/disregarded artity name, if different from above									
₹ <u>2</u>	mastress removes experted only remo; it different north above									
90.	Check appropriate box for federal tax classification:					Exemptions (see instructionals				
8	Mindividual/sole proprietor C Corporation S Corporation Partnership Trust/estate									
erse			Εx	Exempt payee code (if any)						
See Specific Instructions on page	☐ Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=partnership) ➤			Exemption from FATCA reporting code (if any)						
Ě	☐ Other (see instructions) ►				-			~~~~~		
Sign	Addispressional and active color active color and active color active	iter's name	e and	addres	s (opti	onal)				
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37	City, state and ZiS code									
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	List account number(s) here (optional)									
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	Taxpayer Identification Number (TIN)	Social s		kr m m	har		*******			
nter nter	your TIN in the appropriate box. The TIN provided must match the name given on the "Name" line and backup withholding. For individuals, this is your social security number (SSN). However, for a	5000000	:::::::		111111111.	;;;;;;;		,		
side	int allen, sole proprietor, or disregarded entity, see the Part Linstructions on page 3. For other									
	is, it is your employer identification number (EiN). If you do not have a number, see How to get a 🔠 🖣	***************								
	If the account is in more than one name, see the chart on page 4 for guidelines on whose	Employ	er ide	ntifica	tion n	ımber		7		
	er to enter.				T			:::		
	Certification	Jeesen Jeesen J.		*********				*******		
	penalties of perjury, I certify that:						,			
173	e number shown on this form is my correct taxpayer identification number (or I am waiting for a numb	per to be	issus	d to n	ne), at	nd -				
	m not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have									
	rvice (IRS) that I am subject to backup withholding as a result of a failure to report all interest or divid- longer subject to backup withholding, and	ends, br	(c) th	e IRS	has n	otified n	se tha	LFam		
1 &	n a U.S. citizen or other U.S. person (defined below), and									
The	FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is con	rect.								
eca. ntere	ication instructions. You must cross out item 2 above if you have been notified by the IRS that you use you have failed to report all interest and dividends on your tax return. For real estate transactions, at paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an incoming the property of the partition of the partition but you	item 2 d lividual re	loes r stiren	iot ap ient a	ply. For	or morts ment (l	gage RA), a	nd		

General Instructions

Signature of

U.S. person≯

Section references are to the internal Revenue Code unless otherwise noted.

Future developments. The IFIS has created a page on IRS gov for information about Form W-9, at www.fis.gov/w9, information about any future developments affecting Form W-9 (such as legislation enacted after we release to will be posted on that page.

Purpose of Form

instructions on page 3

Sign

Here

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, payments made to you in settlement of payment card and third party network transactions, real estate pansactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

- Certify that the YM you are giving is correct for you are waiting for a number to be issued).
 - 2. Certify that you are not subject to backup withholding, or
- 3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the

withholding tax on foreign partners' share of effectively connected income, and

 Certify that FATCA code(s) entered on this form (if any) indicating that you are exempt from the FATCA reporting, is correct.

Note, if you are a U.S. person and a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- * An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- * An estate (other than a foreign estate), or
- A doméstic trúst (as défined in Régulations séction 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax under section 1446 on any foreign partners' share of effectively connected taxable income from such business. Further, in certain cases where a Form W-9 has not been received, the rules under section 1446 require a partnership to presume that a partner is a foreign person, and pay the section 1448 withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid section 1446 withholding on your share of partnership income.

To: US Bank - Campus Commons Branch,

Acct. #:
Routing #:

Rick Singer – Checking Account

Exhibit KK

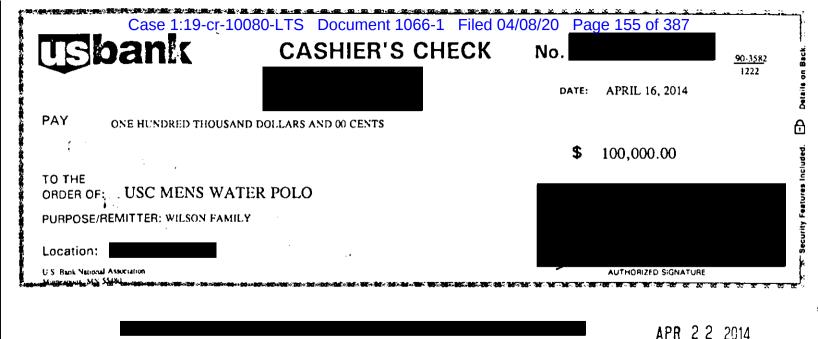


Exhibit LL







Exhibit MM



July 28, 2014



Dear John &

Thank you for your generous gift to USC Athletics Men's Water Polo in the amount of \$100,000. Maintaining state-of-the-art facilities is an essential part of USC's commitment to excellence. Through your contribution, you are helping the University achieve this important goal.

On behalf of the young student-athletes that will benefit from your anonymous gift, thank you.

Fight On!

Associate Athletic Director

ce: Jovan Vavic

Exhibit NN

06/11/2018 17:44:38 Outgoing call to CONFERENCE CALL (MIKAELA, BOB) from Rick SINGER . [Session 514]

UM:	Hello.
UM:	Hello.
UF:	Hello. Rick?
RS:	Yes, Rick Singer.
MS:	[OV] This is Mikaela.
	Hi Rick, this is and Mikaela?
MS:	Yes.
	Hi, are you with
RS:	No. Why would we be with
	Ok, so we're still waiting for
RS:	[OV] No.
	No, no, no I just knew that she was on the phone with know if they were calling in together. Ok, so let's see if jumps on and then I'll connect Bob.
AZ:	
	Here she is. Hold on one second I'll put Bob on.
AZ:	Hello?
RS:	Ok.
AZ:	How are you-
RS:	[OV] , hi it's Mikaela and Rick and um is trying to get [IA] on the phone.
AZ:	Ok.
	Bob's on.
RS:	Bob you're joined?
BZ:	Hey Rick, I'm here.
RS:	Ok, so we got , Mikaela, you and I.
BZ:	Yes.
RS:	So, the meeting's yours.
BZ:	So I-
AZ:	So I just wanted to make sure cuz I know there's been like a lot going on for everything and I'm just like super anxious I guess cuz I only like applied to USC and I just- I don't know what's really exactly happening, but I did talk to Mikaela quite a bit today. And I feel like um I feel a little bit better about it I was just really anxious cuz I- I had no idea what I'm doing. Like its- like what's going on.
RS:	Well- well none of us have any idea.
BZ:	[IA]
AZ:	Yea.
BZ:	Right, so, so Rick my assumption I just want to make sure we're all on the same page is that we were splitting, if was able to complete the 15 credits and have over a 3.0 grade average, that she was going to be accepted into the school. Is that correct or not correct?
RS:	That's- that's not correct. The- the fact is that she had to do well, they didn't never say 3.0. They said that she needed to do all the classes, do all the things- So here's- here's the hurdles that we've already jumped

	through. The original application which she applied when she came out of				
	high school had in the application that there was a VIP application. Cuz we				
	weren't involved in that part of it. Yanno I think you may have asked somebody to help you.				
AZ:	Yea. I had um (sp) write me a letter of recommendation last				
ΛΖ.	year.				
RS:	Ok. So it's in her file that the VIP was- was tried to help you get in but you				
	weren't um you- you weren't even close. They denied you in the first read				
	even with her- with his letter. So when we tried to do this we went through-				
BZ:	[OV] -was home schooled.				
RS:	Right. Well it didn't matter. Her whole record, the whole thing just they- they				
	were confused and were scared to admit her because if- all the things that				
	went on. Ok, and that's USC's issue not anybody else's issue. So, we went				
	through athletics, went through this deal and they came back to me and said				
	there's all these comments in her file blah blah blah blah blah she's- rides				
	horses, does all this stuff so I convinced them that she's at Santa Monica City, she's gunna do well, would you guys help her get in, we'll put her as though				
	she's been um sculling and rowing and then will you get- will you put me on				
	the phone with the crew coach- crew coach got on the phone with me, said ok				
	I will take her, you guys help us, we'll help you, I'll take her, I just need her to				
	finish all these credits and all the all of her classes. If she needs to do well				
	there, so she can get A's and B's that's great, and she finishes all the units				
	then I- then we can help her get in, I've already coded her, flagged her, and				
	she's already just sitting in the system waiting for all the stuff to get done.				
	Then we had the issue of us leaving Santa Monica, essentially, and then I had				
	to go back in and have another discussion with them about why because- and				
	then I explained the issue, and you're um- you're and blah blah blah so that is already in- in the process, it's in the system, it's already				
	there and they have not pushed back on that. So all that's left is for you to				
	finish all your classes now. That we have stated that we would take already,				
	which includes those classes you dropped out of Santa Monica City.				
AZ:	[OV] Ok.				
RS:	They have not finished transfer admission yet, so I have another boy who's				
	actually really strong student who's trying to transfer in and they would not				
	transfer him in even though we've shown them in progress grades, first				
	semester grades, everything until he actually finishes, which is at Santa				
	Monica and he'll finish ah next week, and then when they get the grades then				
	they'll admit him, he's been coded as well just like you. So it's all about				
AZ:	finishing the race. So, that's what I'm worried about is because these courses are eight weeks				
AZ.	then how do I- how would I be accepted if the courses are eight weeks				
	That's- that's what I was wondering.				
RS:	Am I correct in assuming that besides the class that Mikaela's engaged in with				
	you this bio class is the only class that's left?				
AZ:	Yea.				
RS:	Ok. And- [OV]				
BZ:	Would that push her above the 30 required credits or is the bio class-				
RS:	[OV] I don't know.				
BZ:	required? Since-				
RS:	[OV] Mikaela, do you know? How many- how many credits do we have				
	already? Or where we will finish at?				

MS:	Um, sorry that's gunna take a sec for me to calculate, but just give me a moment.
RS:	But either way she doesn't have a science and that will be an issue to them too. So we got the math covered, we got the English covered, the science may be an issue, they always ask me to finish all the little requirements that they ask. But let's say um so I'm gunna still go in to my person and say ok we did everything we need to do um you'll write- you'll write an acceptance there will be a conditional acceptance with her finishing her biology class um my guess is they'll say B- and above. And that'll be- um but she'll get a
	conditional admission.
AZ:	Ok.
RS:	Which everybody gets anyways cuz you have to finish the race to be able to get admitted. And so final-
BZ:	[OV] And the rate- the right amou- the rate [IA] is there a chance they might admit her anyway and they just know that she's taking that class? If she-
RS:	[OV] It would- it'd be-
BZ:	[OV] -credits, or is it-
RS:	It'd be a condition admit. If we got it, it'd be a conditional admit with the finishing of the class.
BZ:	Cuz she didn't have the science, not because she didn't have enough credits?
RS:	Well we have two- two issues.
BZ:	Cuz I just- I-
RS:	We ha- we have two issues. She already- she already signed up for the class at Santa Monica City. And I promised them that she would finish everything that she took there um this the way they were doing it. Cuz they wanted everything done-
AZ:	[OV] Ok.
RS:	Because she had already enrolled in that class at Santa Monica.
AZ:	The only thing that I was worried about is on the letter I got from USC it says
AL.	that um in order to be um considered all my grades would have to be in like to the school by June 30th.
BZ:	[OV] By June 30th.
RS:	Right but you're-
AZ:	[OV] [IA] -Rio Salado. What?
RS:	Right but remember that- that you're going in under athletics and not under the regular admission.
AZ:	So I don't need to worry about that?
RS:	Well not that we don't- they want to push- they want to get you admitted. They want to get this thing done. They want to finish the class. That's- that's why they're pushing everybody.
AZ:	Um I just don't think we had sent them the Rio Salado transcripts because of the um-
RS:	[OV] Correct, we're waiting for the class. Correct. Correct. And I haven't even had that discussion with them yet because all the Santa Monica City kids haven't finished yet either.
AZ:	Um, but my concern is that they can't send my Rio Salado transcript with the F on it.
RS:	That's correct. And we won't send it unless- if they change the grade that's great, and if not we have another alternative to to to fix that to.
AZ:	Ok.
·	- : :

BZ:	What is that?
RS:	Um essentially that I had Mikaela retake the class in the meantime right now
	and so we're trying to get- she's already got the class almost done they just
	won't- they won't take the class any faster than six weeks, not eight- so like
	she's already done with all the work again. We just re-enrolled and did it
	again. So then that way if they said no to this change of grade, then we've-
	but we've already got the class done. That make sense?
BZ:	Yes.
AZ:	Yes.
RS:	We didn't wanna wait because they friggin could take forever and we don't
	wanna wait we just- so I had to re-enroll in the class and take it. And get it all
	done. And they tol- and we got everything done, but we can't submit all the
	final stuff um it's a six week period not an eight week period so, they'll do it
	two weeks early but not any faster than that.
BZ:	And Mikaela do you know when that grade would be posted?
MS:	That grade would be posted with the six week um at like probably the last day
	of June. Um or the first couple days of July.
RS:	I would hope we have an answer-
BZ:	[OV] [IA]
RS:	Before that.
BZ:	Right so at least when you go back you can say might say F, but it's gunna
	say A or whatever it is?
RS:	Right, cuz she- we re-took [IA] and I'll explain the situation about what
	happened at the school blah blah blah. But we gotta re-take and she took it
	and she got the A. We- we're good to go. I just haven't brought that to the
	attention until we get an answer from them.
BZ:	[OV] Ok, and then- and Mikaela did you run the calculation on the number of
	units she currently has?
MS:	Right now it's looking like 46. Between um Santa Monica City, all the work at
	Rio Salado, this includes the bio class as well as the math class.
AZ:	[IA] -from here?
BZ:	And what was- Rick what was she requiring? So did the- in terms of credits
	or units?
RS:	They didn't ask for credits- they just need her to be a sophomore.
BZ:	Ok. So there- there wasn't a 30 unit-
RS:	No.
BZ:	Test to-
AZ:	[OV] Dad, dad I- I definitely have enough credits, but Rick is saying they want
	me to have the science class done because-
RS:	Yea
BZ:	[OV] ok.
AZ:	[OV] -Santa Monica.
BZ:	Ok, so I guess then the last question is I was sending, by the way just so you
,	know ah (sp) got a grade average.
RS:	That's awesome.
BZ:	If that helps. So you- I think now she's got a and and 's got a 4.0. Um
	ah ah so is it possible because I had leaving tomorrow to go to Europe
	to take care of the state of th
	possible to have Mikaela assist on the biology class?
RS:	You have- you have to ask Mikaela. It's not my gig.
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

BZ:	Yea, yea no I'm asking. I mean- I- that's why I have everybody on the call.
MS:	Yea, that's- I'm happy to- I'm happy to assist.
BZ:	Ok. Ok. And then that grade would be due when? When will that grade
	come back? Is that gunna be a July-
MS:	[OV] -the same as.
RS:	[OV] -unless she can do it in six weeks.
MS:	Yea, that one's gunna be um the start date for the class is today um let me log in to see the last possible date for the class. Right now, sorry just bear with me again.
BZ:	Ok. So you'd have to explain that the science would be a contingency of admission? And this- [IA]
RS:	[OV] Right.
BZ:	[OV] Additional admission-
MS:	So, with the biology class the last the last end date possible is um August 4th. So we would say about two weeks ahead of that um so that would bring us to July July 21st.
BZ:	Ok.
RS:	So I would tell USC that we- that we have one class left. We've been taking all of our classes, here are our grades. And that one class will be in by around July 21st we have a commissional- conditional admission now and based on that grade. And if she does well in the class then we're all set. If she doesn't then it's our fault. But we want a conditional admission.
BZ:	Ok, and then when do you think Rick or Mikaela, we're gunna hear back on
	the art history class being over turned and not having to rely on the new grade?
MS:	You know, that unfortunat- I would have liked to- it was supposed to be two weeks um-
BZ:	[OV] Right.
MS:	-and I've been in communication with Rio Salado and they haven't given me any insight in into where they are in the process. So I'm still keeping at it. I'm still answering their questions as needed um and as soon as we have an update I will get back to you.
BZ:	Ok, so we need either that-
RS:	[OV] - finish the class.
BZ:	-is that or the other grades?
RS:	Correct. To be able to go to conditional admission. Correct. You're correct.
BZ:	Right. So we really won't know when got it. I mean with what you're laying out it should be that if Mikaela takes biology class and gets a B- or better and the art history crass- class either gets reversed or they take the new grade assuming she gets a a B or better, she should be able to get in through what you have set up.
RS:	There should be a conditional admit, yes.
BZ:	Right, and she should fulfill the conditional obligation and everything should work out.
RS:	That- that's our hope.
BZ:	That's your hope.
RS:	[OV] Nobody's pushed Nobody's
BZ:	[OV] probability on that?
RS:	No, I dont' have a probability. I just would say that there's been push back. The boy, we're waiting for the grade, he actually got a denial letter already.

	And then , the Dean, called him up and told him we made a mistake. So,
	there- there are- you- you haven't gotten anything, which is good because
	you're on board of getting everything accepted. There's been no issues.
AZ:	Ok.
RS:	Well, you would've already gotten a letter with it-
BZ:	[OV] Ok.
RS:	
	[OV] -with all these other- there- there like 30 kids who got the wrong letter. So you're not one of em, which is great.
AZ:	I can't even imagine how much anxiety that was.
RS:	Well, but at least they reversed it right away so that was good.
BZ:	[OV] So-
AZ:	That's good.
BZ:	Ok. Alright. So we- we'll know when you get that grade. Hopefully we get it this week and if not then we won't know until the end of the month. So she's not gunna know for at least a week to-
RS:	[OV] -two weeks.
BZ:	[OV] -sometime in mid July.
RS:	Well a couple weeks.
BZ:	Right.
RS:	By the end of this month, that's our goal.
BZ:	Ok.
AZ:	I just want to make sure that you know that my- my grades for Rio Salado
	have not been sent, any of them because of the one class.
RS:	Because when we do then there- all that'll be on there.
AZ:	Yea.
RS:	That's why we want it all at one time.
AZ:	Yea. Ok.
BZ:	Ok. Alright. So we have a plan. Mikaela if you can do the biology thing just makes sure it gets done as quickly as possible, so we have a backup plan for the conditional and then you do the best you can to overturn the art history and ah you're just gunna have to trust the process. Rick do you think should be thinking about a backup plan? Or are you highly confident this is gunna work out?
RS:	I mean I'm confident but yanno you never know what's gunna happen right? So, what would- if she had a backup plan what- where would you want to go? Or what would you want to do? Would you still-
AZ:	[OV] I mean I didn't apply anywhere anywhere else.
RS:	[OV] That's not, that's not-
AZ:	[OV] So I don't know where-
RS:	[OV] That's not the problem. I can handle [IA]. If you were would you go another semester to yanno like what we're doing or SMC or whatever it isgunna go to a four year right now what school would you want to go to?
AZ:	I have no idea.
RS:	Ok, well think about it.
BZ:	[OV] If she doesn't get acceptance though. Does-
AZ:	[OV] Something I've got to think about.
BZ:	Isn't it highly unlikely she would get in to USC in the future, or is it not the case?
RS:	No, no, no. No, it just, we're time is- time is becoming. It's a matter of how many kids- the worse case scenario I'm gunna go to them and I'm gunna say

	listen they don't need housing, just take this as an admit, don't worry about the housing part of it, we'll cover that because that'll become after awhile we'll throw that back at me and I'll just say we don't need housing cuz right you're gunna stay with your sister?
AZ:	Yup. [IA] As long as I'm in the school
RS:	Right, right, right.
AZ:	I don't care where I live. [Laughing]
RS:	But that's- that's what they'll throw back at me Bob, and I'll just say don't worry about it we got that covered just admit her. I got the- I don't need a I don't need a spot.
BZ:	Ok. Alright. So I I think you should go with your sister to Europe, relax don't worry about it, and we'll just be patient and trust that this works out.
AZ:	Ok.
BZ:	Ok? Alright. Thank you guys.
AZ:	[OV] Mikaela I'll keep in touch with you. Thank you so much Rick.
RS:	Ok guys.
BZ:	[OV] Ok, thank you.
RS:	[OV] Take care.
MS:	[OV] Ok, I'll touch base with you later.
BZ:	[OV] Ok, bye.

Exhibit OO

wrote:

From: Rick Singer
To: Bob Zangrillo

Sent: 6/26/2018 12:08:50 PM

Subject: Fwd: USC!!!

See below - one more email about fall coming.

Sent from my iPhone

Begin forwarded message:

From: Donna Heinel

Date: June 26, 2018 at 11:56:53 AM EDT

To: Rick Singer

Subject: Re: USC!!!

Yes

Sent from my iPhone

On Jun 26, 2018, at 7:39 AM, Rick Singer

Was accepted through athletics

Sent from my iPhone

Begin forwarded message:

From: Bob Zangrillo

Date: June 26, 2018 at 9:09:19 AM EDT

To: Rick Singer

Subject: Fwd: USC!!!

FYI

DRAGON | GLOBAL **Robert Zangrillo** *Chairman & CEO*

NOTICE TO RECIPIENT: This communication (including any attachments) is intended solely for the recipient(s) named above and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation

Begin forwarded message:

From:

Date: June 17, 2018 at 2:53:49 PM EDT

To: Bob Zangrillo Subject: USC!!!

Exhibit PP

From: To: CC: Sent: Subject:	Case 1:19-cr-10080-LTS Document 1:066-1 Filed 04/08/20 Page 174 of 387 9/20/2018 2:16:32 PM Re: Invoices			
Reference Wom	en's Athletics Donation			
Sent from my iP	Phone			
On Sep 20, 2018, at 10:58 AM, wrote:				
200K From: Rick Sing	September 17, 2018 3:39 PM			
did you send an invoice for 200K donation to Bob Zangrillo through?				
also a che	eck for 50K goes to			
USC Women's c/o of Sr Wome	Athletics en's Administrator Donna Heinel			
	> wrote: nentioned an invoice you were going to send me, Only have one, he mentioned another			

Exhibit PP-1

From: To: **Bob Zangrillo** Sent: 9/5/2018 11:13:46 AM Re: Invoice for The Key Worldwide Foundation Subject: If it is donation, can it be deductible and go directly to USC? On Sep 5, 2018, at 8:10 AM, Bob Zangrillo > wrote: Let discuss **DRAGON** | GLOBAL **Robert Zangrillo** Chairman & CEO NOTICE TO RECIPIENT: This communication (including any attachments) is intended solely for the recipient(s) named above and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation Begin forwarded message: From: **Date:** August 29, 2018 at 12:55:28 PM PDT To: ' Cc: Subject: Invoice for The Key Worldwide Foundation Please see attached invoice from The Key Worldwide Foundation. Feel free to contact us with any questions. Thanks! <image001.jpg>

Exhibit QQ

Case 1:19-cr-10080-LTS Document 1066-1 Filed 04/08/20 Page 178 of 387 <u>KOBERT ZANCHI</u> I O 11 35/1710 CA 249 Women's Athletics 1 \$ 50,000°° Dollars 🙆 🖫 Bank of America FOR Obnation WVB Floor

Exhibit RR

PAGEBREAKINSERT

<<< TRN: >>>

**** MESSAGE ENVELOPE ****

SRC:FED CALLER:

RPT# AMT:200,000.00

TEST: VAL:

CBL:N DBT

ADV:LTR

DEBIT VAL: 18/09/20 CTYP AMT:200,000.00 CUR:USD

GL RECON: DEPT:

JPMORGAN CHASE BANK, N.A.

COUNTRY OF RESIDENCY: US

BK?N

SPECIAL INSTRUCTIONS:

IF INVALID SWIFT IN ORDER BNK FIELD

*REMOVE S. EXAMPLES SBARNSHR,

*FIDLNFSC, PRUSECUR, FCNBDLS2003 ORIG TO BNF INFO:

SNDR REF NUM:1 ORIG:/

ROBERT L. ZANGRILLO

REF NUM: OS1 OF 18/09/20

(Bank : 121)

SND DATE: 18/09/20

EXT:

CUR:USD RATE: 1.

TRDR#

CHG:

TYP:FTR/ FNDS:S CHG:DB:W CD:A COM:N

CDT

CREDIT VAL: 18/09/20 CTYP AMT:200,000.00 CUR:USD

GL RECON: DEPT:

THE KEY WORLDWIDE FOUNDATION

COUNTRY OF RESIDENCY: US BNF:/

THE KEY WORLDWIDE FOUNDATION

DONATION

Exhibit SS

From: Marci Palatella [/O=FIRST ORGANIZATION/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=MARCI]

Sent: 3/14/2016 7:20:31 AM

To: Rick Singer

BCC: Marci Palatella

Subject: Re: Have you seen this? My cousin's wife's family.

This is a conversation I'd really like to have with you. We need to get our chess board set up now... He says he wants to go away but doesn't realize he would not see us more being closer, like at Santa Clara. But Santa Clara has no football. Rick, his dr tells

me won't get bigger. I worry as a guard he'll get hurt at a big D1 school.

(Jewish mom). He works twice as hard to get grades. Right now he has

4 B+, a C+, and a D+ in math which he will bring up.

Money, for the right environment,

Yes. But he can never know. We'd do it anonymously. What would that look like and where would be his options? We have friends who underwrite an athletic year or a chair. What schools can we look at?

Do you have any time to talk today?

Marci Palatella

On Mar 14, 2016, at 7:07 AM, Rick Singer wrote:

All of those special and unique things we can grow and embellish for his apps.

The question is where do you want him to go to school?

Do you want him close? Far away? Small school where he has a chance to play football at a D3 school? Do we have attend a D1 school where he is a part of the team as a manager or player but never plays?

Are you willing to make a contribution of several hundred thousand as a donation to get him in as a participant in someone's program?

Sent from my iPhone

On Mar 13, 2016, at 11:44 PM, Marci Palatella wrote:

Yup. He needs a place to shine on applications. has raised money for years for his brother's special needs camp just because he wanted to help them. (like since he was 10!) He has been passionate about those kids but can't express it well. He's obsessed with and very good at football but not training off season.

We are building a distillery and he's very interested in getting involved in that. And we have vineyards and opportunities there he likes too. But what's his hook for school?? He rarely tests well but gets A's on his homework and class work. And he has generous parents. But he needs his own hook.

Rick, I stress daily about this. Need to plan now before next year. Can you help get him positioned? 8??

Marci

On Mar 13, 2016, at 11:35 PM, Rick Singer wrote:

Gotcha- time to strategize

Sent from my iPhone

On Mar 13, 2016, at 8:37 PM, Marci Palatella wrote: Now ita??s my turn to agree. Need you to strategize with me as my husband is not into this at all. I need guidance and then you will have to help present this and get a commitment. Momâ? is a loser and could not possibly know whatâ??s right! Let me know, ok? I need help From: Rick Singer [mailto: Sent: Sunday, March 13, 2016 3:44 AM To: Marci Palatella Subject: Re: Have you seen this? My cousin's wife's family. Agreed. Boys are slower that is why pushing into the next growth spot may have to be the strategy instead of allowing he to decide Sent from my iPhone On Mar 12, 2016, at 11:16 PM, Marci Palatella wrote: Rick I worry that he does not yet have that drive unless it's for football; he's young for his age. I think the discipline of Krav Maga would be fabulous! Marci Palatella On Mar 12, 2016, at 9:59 PM, Rick Singer Krav Maga has levels -1-5. Yes I am a 4- would trim down with Krav Sent from my iPhone On Mar 12, 2016, at 9:32 PM, Marci Palatella wrote: I have heard that, but the new facility is in LA. Heâ??s really â??huskyâ? which worries me to death. SOMETHING would be great! Oâ?? that youâ??re a black belt or that equivalent? I hear from From: Rick Singer [mailto: Sent: Saturday, March 12, 2016 9:16 PM To: Marci Palatella Subject: Re: Have you seen this? My cousin's wife's family. It is awesome training- should try it Sent from my iPhone On Mar 12, 2016, at 9:12 PM, Marci Palatella wrote: They have been doing this many years, apparently training military and police forces. But youâ??d know if they were in the inner circle! I have no idea but thought of you when I saw this.

ALI_0006976

Have a great weekend

From: Rick Singer [mailto:

Sent: Saturday, March 12, 2016 9:10 PM

To: Marci Palatella

Subject: Re: Have you seen this? My cousin's wife's family.

Smart move if they get the master to run it from Santa Monica. He is the Israeli commando

Sent from my iPhone

On Mar 12, 2016, at 9:06 PM, Marci Palatella wrote:

<image001.jpg>

Exhibit TT

From: Marci Palatella

Sent: Monday, October 3, 2016 10:43 AM

To: Rick Singer

Subject: Re: re schools, please reply

Marci Palatella

On Oct 3, 2016, at 7:32 AM, Rick Singer wrote:

I got it covered no worries on the story for

Sent from my iPhone

On Oct 3, 2016, at 9:31 AM, Marci Palatella

Ok, got it.

Is it going to hurt that he took this year off? He's played non stop for 6 years. His dad has been ill and overall it's all just been too much for him. He was one of only 4 players moved up to Varsity as a sophomore. Should he go back now this season or can he go back as a senior??

Marci Palatella

On Oct 3, 2016, at 2:05 AM, Rick Singer wrote:

He needs to get in through Football so my relationship at that level gives a shot since that is the sport with the lowest grades. Notre Dame and Vandy lowest football players are 3.4 and have to be big time players. Cannot hide him there.

Sent from my iPhone

On Oct 3, 2016, at 1:59 AM, Marci Palatella < wrote:

Yes, being happy and loving school is critical. His high school is so demanding that our head of school told me that ANY school he goes to will be easier than this, and he knows us well.

Hear you on the ones that are a total NO. Won't ask about those again.

You know that took a year off football this year and says he just needed a break and will play next year. So given that, and they he's not the team's star but a good solid player, would he really still have an athletic edge? is a natural, but he's gotten the message that he is not big enough for college football. I think that's one of the reasons he dropped out. (And his dad pressured him about his weight and

was very upset)

How would he have an athletic edge at a bigger name school given the other players are huge?

I'm trying to put together a realistic list and narrow down which schools to see, which to keep in our conversation.

The UCs, really??? UCLA he loved (half of our family went there it is there) but that's a pipe dream isn't it?

And Notre Dame and Vandy, average grades and generosity won't do it? How would a UCLA or Cal take us?

s former trainer at home, a wonderful guy, is one of the head football trainers at CAL but how would anyone know about him at any of these schools? He doesn't have a marketing video!

Thanks, Marci

Marci Palatella

On Oct 2, 2016, at 10:59 PM, Rick Singer wrote:

First and foremost is the health of in and out of the classroom. The default is will have a tutor 4 days a week for 2 hours and on Sunday's.

Several of the school's besides being very difficult to get in are a grind and there are no easy classes.

Those schools are - Hopkins, Mellon, Duke.

No matter the board member you know the grades and very good/solid scores will not get him in unless you anti in the many millions.

The only way in is through athletics due to the leeway given to athletes.

Possibilities

USC, Boston College, U Miami, Tulane, SMU, Texas AM, U Washington, UC Berkeley, UC Santa Barbara, UC Davis, UCLA, Wake Forest, Villanova, Indiana, Santa Clara, U San Diego

NotreDame, Vandy- too tough on acceptance of athletes

Sent from my iPhone

On Oct 3, 2016, at 12:16 AM, Marci Palatella < wrote:

Hi Rick,

I am starting to plan our early 2016 college trips now. Some we may be able to hit on a few weekends before then, so I want to make sure and get together a realistic list.

IF had a B average, and SAT scores that you can guess at (I'm assuming fairly accurately). Which of these would be actual possibles for him if we were also "generous"?

And what and where am I missing?

See below:

USC
Boston College
Notre Dame
Vanderbilt
Wake Forest
Johns Hopkins
Carlegie Melon
Duke

Wisconson (one of our dear friends is on the board but he's also very uptight and I don't want to say anything unless

is set on it)
SMU
Santa Clara (we also have some juice there)
Purdue?

This much be the most insane part of your job, the neurotic parents!! Please just put a note next to each.

Thanks!! Marci

Safety Schools:
University of Kentucky (It's one of the only places he's ever been so he talks about it!! But he needs to see many before deciding what feels right)
University of Oregon
University of Louisville (No idea what this is like, but he looked at it on line)

Exhibit UU

From: To: Sent: Subject:	Case 1:19-cr-10080-LTS 1/2/2018 6:56:38 PM Re: gift posted	Document 1066-1	Filed 04/08/20	Page 191 of 387
Thanks				
Sent from my iPh	hone			
On Jan 2, 2018, a	at 3:55 PM,		wrote:	
Hi Donna,				
Saw a few more:				
Mrs. Marci Palate	ella posted \$100,000 on 12/18/17	to Women's Athletic Bo	oard Fund #	
And				
Mossimo Giannu	lli Trust \$50,000 on 12/18/17 to s	ame account		
From: Donna He Sent: Tuesday, Ja To: Cc: Subject: Re: gift p	nuary 02, 2018 1:58 PM			
Thanks!				
Sent from my iF On Jan 2, 2018	Phone , at 1:56 PM,		wrote:	
Hi Donna,				
A gift of \$50,000	recently posted on 12/20/17 toward	ards the USC Women's	Athletics Fund acco	ount # from:

Exhibit VV

From: Marci Palatella

Sent: 3/7/2017 8:38:25 AM

To:

Subject: Donation

Attachments: Inv_1131_from_The_Key_Worldwide_Foundation_7144.pdf; ATT00001.txt

please discuss with me and pay today.

The Key Worldwide Foundation	
Bill To	
Allied Lomar	

Invoice

Date	Invoice #
3/7/2017	1131

Description		Amount
Private Contribution - Letter of receipt will be provided upon payment.		75,000.00
Wire Instructions . The Key Worldwide Foundation		
Routing #:		
Account ## [
Swift Code:		
Bank Information: US Bank,		
501c3 FEIN	Total	\$75,000.00

Marci Palatella

Exhibit WW

```
Rick Singer
From:
             3/14/2016 3:02:42 PM
Sent:
To:
            Marci Palatella
            Re: Let me know ASAP if "possibles'
Subject:
Georgetown BC may be over 1m others as stated-
Sent from my iPhone
> On Mar 14, 2016, at 2:57 PM, Marci Palatella
                                                                      wrote:
> 3 parts:
        has to be happy and able to compete while there. AGREE
> 1)
> 2) For each school, the approximate number it would take to get in there
> 3) So for each, what's a realistic possible, and what's the number for those
> When we spoke, $300-400 was one level, and the second level was $750-1m
> Can you clarify? He has to be happy and able to be part of a group where he's a fit.
 :) Waiting to hear
>
>
> ----Original Message----
> From: Rick Singer [mailto
> Sent: Monday, March 14, 2016 1:00 PM
> To: Marci Palatella
> Subject: Re: Let me know ASAP if "possibles"
> First issue is competing when he is there which is my first concern.
> Second is the number it would take to get admitted even with the fudging of the scores.
> I will reply based on you making the appropriate donation
> Sent from my iPhone
>> On Mar 14, 2016, at 11:50 AM, Marci Palatella
                                                                        wrote:
>> Be honest!
  1.Good possible
>> 2.Slight chance
>> 3.Smoking crack
>>
>> Villa Nova
>> Texas A&M-75 percent
>> Occidental - 50 percent
>> Georgetown- 75 percent -significant large donation
>> USC- 75 percent - large but not significant Cornell-zero
>> Vanderbilt- zero
>> Tulane- 75 percent
>> Boston College- significant large donation Old Miss-90 percent
>> SMU- 75 large donation
>> Duke-zero
>> Notre Dame- 50 percent but will send him to ST Marys in Indiana then
>> transfer in with significant donation
>> Rutgers- bad school
>>
>>
>> Marci Palatella
```

Exhibit XX

From:

Sent: Monday, March 20, 2017 11:48 AM

To:

Subject:

Homa, Rick Singer, please let me know if you want to speak or if you have decision one way or another as I must act quickly. Thx I started to speak with my daughter this morning. She became extremely upset as to why I am pressuring her to make a decision on the spot. I am having a real hard time. I made arrangement to have one of our friends with whom she has great rapport to speak with her today. Right now my daughter is over at her house. I am just having a real hard time. Is there any way to delay the decision for a few days. Kids become rebellious when they are forced and tend to do opposite of what is suggested to them by parents. I advise other people's kids for my living, but with my own kids, they shut down when I try to talk with them. I have never forced them into anything so there is no reason for that. I am just wondering if you can give me a little time so that we can approach my daughter in a way that is more conducive. I really appreciate what you have done. I can ask tomorrow but my guess is the answer will be no. Since the funds have been transmitted I need to cover myself. If they say no then I need to pull the trigger then. Please keep me abreast tonight. It sounds as though USC is not important to her so I would let it go. It will hurt my relationship with my folks but I will beg my way out of it hopefully We had a rough day yesterday with much of going to her room and shutting the door. Her concerns have been feeling that she did not get in on her own merits. I have not shared anything about our arrangement but she somehow senses it. She's concerned that others may view her differently Also because I work there, she's concerned that she is not as independent She has not given a definitive answer but keeps saying that it seems like I have no choice I take it as yes I'm sure you have experience with many teens behaving in this way and many of my colleagues' kids had also refused to go to USC does recognize what an amazing school this is. I will go with our arrangement. However I don't have \$100k of cash. You had previously told me that half was now to USC and I was going to put on card and you said half wad in the fall. In our phone conversation, you mentioned that I can pay you over 6 months. If so. I can provide you each month a check Thank you for your response. I am flying home as I write from Chicago. Yes I have seen kids like push back. What she has to come to grips with is that receiving help with USC is a gift because of your dedication and work for many many years. One day when is done with her education she may come to you and your wife or friends of yours to help get a job or interview because of how competitive the marketplace is today. Another aspect of the admission to USC is that she can definitely do the work but the barrier to entry is so difficult. She will compete quite well because of the foundation created and developed at Viewpoint. As for payment- the money will be deposited in the next day or two. My foundation sent the money as requested. Normally the first 50k is sent immediately after acceptance and before the final letter is received. Then the next portion is sent soon after the final letter is provided. Since both are happening on top of each other I sent the monies to my contact as a donation so there is no conflict internally because you are designated as a giver through another department but that was not the group who helped. The group helping wants the credit and funds so it is cleaner through me. Yes I agree that you can make the 100k payment over the next 6 months starting April 1st. You can send to my foundation as a donation/write off or if you have your own company we can invoice you as a business consulting fee from our profit business and you write off as an expense. If you want to complete the transaction by credit card that is fine too. I just need you to designate, which path do you want to be invoiced. Please let me know? Final acceptance will come in the next 10 days or so.

Exhibit YY

```
Call Date: 2018-10-25
 1
 2
    Call Duration: 3:09
    Call Begin [ ] Call End [ ]
 3
 4
    Call Participants:
 5
        Rick Singer
 6
        Robert Zangrillo
    File Name: 2018-10-25 19-48-37 10726-001
 7
 8
    Bates No.:
 9
    SINGER: [00:00] Bob, how are you?
10
11
    ZANGRILLO: Hey, Rick, how are you?
12
    SINGER: Good, I just wanted to touch base and see how things
        are going.
13
14
    ZANGRILLO: Uh.
15
    SINGER: (inaudible) good?
16
    ZANGRILLO: Uh, you know, work in progress (inaudible).
17
    SINGER: Does it ever end for you?
18
    ZANGRILLO: No, it does not ever end. As long as you
19
        aren't calling me saying there's any drama. Just make
        sure that all of, uh, _____'s (sp?) work is getting done
20
21
        (inaudible).
22
    SINGER: Absolutely.
23
    ZANGRILLO: OK, yeah (inaudible).
```

- 1 SINGER: (inaudible) all of the -- all the work we're doing
- 2 for right now (inaudible) getting done absolutely
- 3 (inaudible).
- 4 ZANGRILLO: OK, great, that's the only thing I was worried
- 5 about. (sp?) is good, she -- she took a semester
- off. She's working here in Miami. And as she's doing
- 7 great she's, you know, going to graduate close to 4.0.
- 8 And (inaudible).
- 9 SINGER: Good.
- 10 ZANGRILLO: Looking for a place so that she's, uh, ready to
- 11 start in January.
- 12 SINGER: OK, good, because I know that the classes that
- 13 Mikaela took for her in, uh, uh, d-- at the beginning of
- the year [01:00] when she left Santa Monica and now these
- 15 classes, uh, everything will be perfect. So we'll have
- no issues.
- 17 ZANGRILLO: Awesome. Is there anything else you
- 18 need?
- 19 SINGER: Yeah. The only other thing I just want you to know
- is that so my foundation is being, uh, audited now.
- 21 ZANGRILLO: OK.
- 22 SINGER: Like every foundation. And we got hundreds of
- families that have been through our foundation.
- 24 ZANGRILLO: Yeah.

- 1 SINGER: So I just wanted to make sure that you know that I'm
- 2 not going to t--, uh, tell the IRS that essentially we
- 3 got in and -- and essentially paid Donna Heinel
- 4 (sp?) at USC to help get in. We're not even going
- 5 to talk about that. All I'm going to say to the IRS is
- 6 that, uh, essentially the moneys that you paid, uh, all
- 7 went to, uh, our foundation.
- 8 ZANGRILLO: Yeah.
- 9 SINGER: And because essentially they're also looking at -- I
- think we have a total payments of over 500,000 --
- 11 ZANGRILLO: Mm-hmm.
- 12 SINGER: Which would have -- would have -- would have
- included, uh, early on with, uh, and NYU.
- 14 ZANGRILLO: Yeah, yeah, yeah.
- 15 SINGER: So I'm just going to say that, you know, [02:00] n--
- nothing really happened, uh, from that perspective.
- 17 Essentially that she d-- that didn't get in NYU and
- 18 no payment was made to my contact at NYU --
- 19 ZANGRILLO: Mm-hmm.
- 20 SINGER: Which we know it was.
- 21 ZANGRILLO: Right.
- 22 SINGER: Uh, and then we -- and then won't say
- 23 that the, uh, the moneys went to go pay Donna Heinel

- 1 (sp?) for USC to get her in. And the other part is when
- 2 (inaudible) audit --
- 3 ZANGRILLO: What -- what -- what -- what will be
- 4 the thing -- what was the payment for? Just so I
- 5 know so we have the story straight.
- 6 SINGER: So the payment is all the same thing. All
- 7 your moneys including the classes that Mikaela took for -
- 8 –
- 9 ZANGRILLO: Yeah, yeah.
- 10 SINGER: Uh, all will show they're f-- to our
- 11 foundation.
- 12 ZANGRILLO: Yeah.
- 13 SINGER: And will all show that she, uh, that they were given
- 14 to -- for, uh, our programs that handle underserved kids.
- 15 ZANGRILLO: OK, great, perfect.
- 16 SINGER: OK?
- 17 ZANGRILLO: OK, I got it.
- 18 SINGER: I just want to make sure that we're on the same
- 19 page. Uh, they may never call but just so you know
- 20 (inaudible).
- 21 ZANGRILLO: Yeah, OK, just in case they do.
- 22 SINGER: Yeah, because I'm -- I'm in Boston now.
- 23 ZANGRILLO: OK.

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Page 5

1 SINGER: And I haven't been back to LA for a while so I just

want to make sure I [03:00] connected before it got too

3 late.

4 ZANGRILLO: OK, perfect. Thank you, Rick.

5 SINGER: All right, take care.

6 ZANGRILLO: OK, bye.

7 SINGER: OK, bye-bye. [03:09]

8

9 END OF AUDIO FILE

Exhibit ZZ

```
Call Date: 2018-10-25
1
   Call Duration: 2:13
   Call Begin [ ] Call End [ ]
3
   Call Participants:
4
5
       Mossimo Giannulli
6
       Rick Singer
7
    File Name: 2018-10-25 13-17-38 10670-001
8
   Bates No:
9
10
    SINGER: [00:00] Moss. How are ya?
11
   GIANNULLI: Uh, good, pal. How are you doin'?
    SINGER: Uh... How's your business?
12
13
    GIANNULLI: Uh, it's unbelievable.
14
   SINGER: Tell me about it.
    GIANNULLI: It's goin' just fantastic. Uh, I sold half of
15
       it to And, uh --
16
17
    SINGER: Oh, did ya?
    GIANNULLI: -- yeah -- and it's just -- we're just scaling
18
19
       now. It's just been fantastic.
    SINGER: Well, congratulations. It's awesome.
20
   GIANNULLI: Thank you. And the girls are absolutely loving
21
22
        SC.
23
   SINGER: That's what you want, ri--?
```

24

GIANNULLI: Yeah.

- 1 SINGER: Every dad wants that.
- 2 GIANNULLI: Yeah. So. And sis really flourishing
- 3 too, which is nice. So I'm really happy for her.
- 4 SINGER: No, that's fabulous. So. So I'm -- I'm calling,
- 5 uh, 'cause I just want to make sure you're -- give you a
- 6 heads-up that... So my foundation is being audited --
- 7 GIANNULLI: OK.
- 8 SINGER: -- which, as you know, is normal.
- 9 GIANNULLI: Yeah.
- 10 SINGER: And so they're looking at all the payments. So they
- 11 -- they asked me about your 2 payments of 200,000.
- 12 GIANNULLI: [01:00] Uh...
- 13 SINGER: And, of course, I'm not gonna say anything about
- your payments goin' to Donna Heinel at USC to get the
- 15 girls into USC, through crew. So --
- 16 GIANNULLI: Sure.
- 17 SINGER: -- that's for sure.
- 18 GIANNULLI: Right.
- 19 SINGER: But what's funny... It's funny. Because Donna
- called me couple weeks ago and says, "Hey, uh," you know,
- 21 "going forward, can you use the same format you used for
- 22 and the regattas that you put in there,
- for any girls, going forward, that don't row crew?" So
- it's funny how... I thought I was just makin' stuff up.

- 1 GIANNULLI: Uh, right. Uh...
- 2 SINGER: Uh, but -- but they loved it, love--
- 3 GIANNULLI: Uh, right. Perfect.
- 4 SINGER: So I just want to make sure our stories are the
- 5 same, because --
- 6 GIANNULLI: Yeah.
- 7 SINGER: -- an th-- and that your 400K was paid to our
- 8 foundation to help underserved kids.
- 9 GIANNULLI: Uh, perfect.
- 10 SINGER: OK? So I just want to make sure that we're on the
- 11 same page, in case...
- 12 GIANNULLI: Uh...
- 13 SINGER: Who knows if they'll call or they [02:00] don't.
- 14 GIANNULLI: Perfect. Got it.
- 15 SINGER: OK.
- 16 GIANNULLI: Uh...
- 17 SINGER: And congratulations to the girls and --
- 18 GIANNULLI: Thank you.
- 19 SINGER: -- on your business.
- 20 GIANNULLI: Thank you. Thanks, pal.
- 21 SINGER: A--
- 22 GIANNULLI: We'll talk to you.
- 23 SINGER: OK.
- 24 GIANNULLI: OK.

2018-10-25 13-17-38 10670-001

Page 4

1 SINGER: Take care. Uh...

2 GIANNULLI: Uh...

3 SINGER: Buh-bye. [02:13]

4

5 END OF AUDIO FILE

Exhibit AAA

- 1 **Call Date:** 11/29/2018
- 2 Call Duration: 04:13
- 3 Call Begin [] Call End []
- 4 Call Participants:
- 5 Rick Singer
- 6 Laurie
- 7 **File Name:** 2018-11-29 17-39-37 12374-001
- 8 Bates No.:
- 9
- 10 LAURIE : [00:00] Hello?
- 11 SINGER: Laurie (sp?), it's Rick Singer. How are you?
- 12 LAURIE : I'm good, Rick, how are you?
- 13 SINGER: Good. The girls good?
- 14 LAURIE: They're really good. They love USC. They're really
- happy.
- 16 SINGER: And are you on -- onsite, on -- whatev-- whatever --
- um, filming now? Are you at home?
- 18 LAURIE : I'm at home right now actually.
- 19 SINGER: Awesome. Awesome.
- 20 LAURIE : Yeah. Yeah.
- 21 SINGER: So I had -- I had talked to Moss (sp?) a couple, uh,
- 22 weeks ago that we were getting audited --
- 23 LAURIE : Uh-huh.
- 24 SINGER: -- our foundation.

```
1 LAURIE : Uh-huh.
```

- 2 SINGER: So I -- I just -- and I'm -- I just tried reaching
- 3 out to -- so what I wanted to try to do is just make sure
- 4 that you guys know they went through all my -- a bunch of
- folks and they're going to make calls to several families
- and it looks like you guys are going to be one of those.
- 7 There'll probably be 8 or 9 that they're going to call.
- 8 LAURIE : [01:00] OK.
- 9 SINGER: Because they had this question about why did my
- foundation get \$200,000 2 consecutive years and then
- 11 nothing after that. So I just want to make sure that you
- 12 know that, one, that you're probably going to get a call
- and that I have not told them anything about the girls
- going through the side door, through crew, even though
- they didn't do crew to get into USC. So I -- that is --
- all I told them was that you guys made a donation to our
- foundation to help underserved kids.
- 18 LAURIE : Um-hmm.
- 19 SINGER: And that's why you guys have done it. And lots of
- 20 people don't make successive donations going forward.
- 21 LAURIE: OK. But I-- I'm confused. But we -- so we made 2
- 22 donations 2 years in a row and so what are they
- 23 questioning?

```
1 SINGER: They're -- so they're questioning all -- they're
```

- looking at all of my donations to my foundation. [02:00]
- 3 OK?
- 4 LAURIE : OK, uh-huh.
- 5 SINGER: And so they went through everybody's and they
- 6 started looking at everybody and saying, "OK, why these
- 7 guys? Why did these guys? Who did these guys fund? Why
- 8 did they do -- why did they do?" So we went through
- 9 everybody --
- 10 LAURIE : Um-hmm.
- 11 SINGER: -- and they just picked out 10, 12 people and said,
- 12 "Hey, we're just going to follow-up with these folks and
- ask them why they made a donation to your program," to
- our foundation.
- 15 LAURIE _: Right.
- 16 SINGER: So I said that's fine. I said, "Can you give me
- some idea of who those people are?"
- 18 LAURIE : Right.
- 19 SINGER: And your -- your guys were one of them. And I said,
- "Well, this is very clean. They made a donation to our
- foundation for underserved kids. They're a great family.
- They've been doing work all over LA. Their kids are very
- engaged in LA and I don't know why you guys think that
- this is weird." And they said, "It's not that we think

- it's weird. We just want to follow-up as part of our
- 2 audit." They're driving me crazy so far. So I --
- 3 LAURIE : Who's -- who's auditing you?
- 4 SINGER: The IRS.
- 5 LAURIE : [03:00] Oh, OK.
- 6 SINGER: Right. The IRS audits foun-- large foundations and
- 7 we have so much money in our foundation and we give away
- 8 so much money they're -- they want to -- you know,
- 9 they're always worried about things going on in
- 10 foundations.
- 11 LAURIE : I see.
- 12 SINGER: So what I -- what I wa-- I told Moss already and I
- wanted to make sure that you knew, as well, if they
- happened to call you, is that nothing has been said about
- the girls, um, your donations helping the girls get into
- 16 USC to do --
- 17 LAURIE : OK.
- 18 SINGER: -- crew even though they didn't do crew. SO nothing
- 19 like that has been ever mentioned.
- 20 LAURIE : (inaudible).
- 21 SINGER: If you ever -- ever were to say anything.
- 22 LAURIE : So we -- so we just -- so we just have to say we
- 23 made a donation to your foundation and that's it, end of
- story.

- 1 SINGER: That is correct.
- 2 LAURIE : OK.
- 3 SINGER: Terrific.
- 4 LAURIE : OK.
- 5 SINGER: I just wanted to make sure I touched base because I
- 6 didn't want you --
- 7 LAURIE : Yeah.
- 8 SINGER: -- to all of a sudden what -- like what's this call
- 9 coming from.
- 10 LAURIE : OK, yeah. OK. Totally. All right. So -- so
- 11 that's it. So it's -- it's the IRS. It's not anyone
- from USC, it's the IRS.
- 13 SINGER: [04:00] That is correct.
- 14 LAURIE : OK. Very good.
- 15 SINGER: OK.
- 16 LAURIE : All right.
- 17 SINGER: All the best.
- 18 LAURIE : All right. Thank you, Rick. Happy holidays.
- 19 SINGER: You, too. Take care.
- 20 LAURIE : OK, thanks.
- 21 SINGER: OK. Bye-bye.
- 22 LAURIE : Bye. [04:13]

23

24 END OF AUDIO FILE

Exhibit BBB

10 24 2018 10 28 39

Page 1

```
Call Date: 2018-10-24
 1
    Call Duration: 11:17
 2
 3
    Call Begin [ ] Call End [ ]
 4
 5
 6
 7
 8
 9
10
11
12
    File Name: 10 24 2018 10 28 39
13
14
    Bates No.:
15
16
    [00:00]
17
18
19
20
21
22
23
24
```

```
1
 2
 3
 4
    (phone ringing) [01:00]
    M1: Rick, you there?
 5
 6
    SINGER: I'm here. How are ya, Bill?
 7
    M1: Oh, hey, sorry about that. My, my bad cell coverage
 8
         there for a minute.
 9
    SINGER: No problem.
10
    M1: I'm good.
11
    SINGER: No problem.
    M1: So what's goin' on?
12
13
    SINGER: So --
14
    M1: I've been feelin' bad for ya.
15
    SINGER: Well, I wanted to apologize yes-- for, you know,
16
         screwin' up our meeting, so I apologize. I essentially
         flew up to Sacramento yesterday, and I'm super happy I
17
18
         did, 'cause I got a chance to meet with my old attorney,
19
20
    M1: Uh-huh.
21
    SINGER: -- a-and he talked me off the ledge, because, as you
22
         know -- as you could tell by my call the other day, I was
23
         on the ledge.
24
    M1: Yeah.
```

- 1 SINGER: Um, he told me that I was overreacting a little bit
- because, um... So I just wanted to make sure that we
- 3 talked, and, uh, you kinda knew what was goin' on. And
- 4 since I respect your opinion, I just wanted to get an --
- 5 your opinion of kinda what's happened --
- 6 M1: Mm-hmm.
- 7 SINGER: -- so that, um -- because you have more experience
- g just in the world than I do. So here --
- 9 M1: Mm-hmm.
- 10 SINGER: -- so here's kinda what happened: [02:00] uh, Mark
- 11 Ridell (sp?), who is the -- my expert test-taker, who
- 12 took the test for --
- 13 M1: Mm-hmm.
- 14 SINGER: -- at Igor School, West Hollywood College Prep, um,
- he called me to meet at _____, you know, in
- 16 West Hollywood. Have you ever been there?
- 17 M1: Never.
- 18 SINGER: OK. Well, it's a really cool place in West
- 19 Hollywood. But he calls me, and he kinda comes out to LA
- every once in a while, and he just had his, his first
- child, so his in-laws live in LA, so he said, "Let's meet
- 22 at So anyway, so Mark starts talkin'
- 23 to me and tells me a story that he, he got interviewed by
- 24 the -- an IRS agent in Florida, because he lives in

Bradenton, about the payments that he received from my 1 2 foundation. And, as you know, when families pay for either, either takin' the test or goin' through the side 3 door, all the money goes through my foundation, and then 4 5 I pay it out to whoever needs to get paid, like I did 6 for, you know, [03:00] test when he 7 took the test at West Hollywood College Prep. So I paid 8 half of it to Mark and half of it to West Hollywood 9 College Prep through my foundation, so that the family 10 essentially has no connection back to what has happened. So I asked Mark what he did with the agent, and what they 11 12 talked about, and he told me that he hasn't been 13 declaring his payments from my foundation as income for 14 his taxes. So apparently he's been declaring all this 15 income as a gift, which was stupid. But the agent said, 16 uh, "I'm really not so focused on Mark and your payments; what I'm focused on is this foundation." And he kept 17 18 askin' him questions about the foundation's mission, what they do, um, how they help underserved kids, so on and so 19 20 forth. So, you know, since Mark does tutoring for us [04:00] he told the agent that, you know, he works with 21 22 kids for us, i-- underserved kids in the Bradenton area.

23 M1: Mm-hmm.

- 1 SINGER: So when he gets done speakin', I kinda freak out,
- 2 right? Because now I'm thinkin', oh, shit, I'm in a --
- 3 I'm in a lot of trouble here, and the IRS has me wired.
- 4 Um, they probably have me -- you know, bugged my house,
- 5 the whole thing, because he's talkin' all about my
- foundation, and, you know, he really wants to dive into
- 7 this. So when I met with , he told me, "Rick, hold
- 8 on. Just relax. Um, for them to get a wiretap on you,
- 9 it takes a, a bunch of months to happen, and you just
- 10 need to relax." So --
- 11 M1: Mm-hmm.
- 12 SINGER: -- you know, overnight I'm a lot less worried than I
- was a couple days ago (laughs) when we talked, but I just
- 14 -- you know, I'm gonna use this phone, which is my son's
- phone, um, and I did it --
- 16 M1: Mm-hmm.
- 17 SINGER: -- for us to talk so that there are, you know, no
- issues, just in case.
- 19 M1: Yep, yep.
- 20 SINGER: And [05:00] it's, it's real-- to be frank with you,
- 21 um, Bill, it's really embarrassing, so I hope you'll just
- keep this between you and I.
- 23 M1: Of course. Well, I think -- I mean, the good news is --
- I mean, from, from my personal perspective, is, is, uh,

- 1 you know, we, we s-- sorta haven't done anything yet,
- which I'd prefer not to do in the context -- just t-till
- it's all cleared up exactly, you know, what the dynamic
- 4 is of the foundation. I'd rather just sorta lay low.
- 5 SINGER: OK. So, so --
- 6 M1: I mean, I -- it, it, it seem-- it seems like a better
- 7 idea, because, I mean, until you're confident that...
- 8 Uh, m-my, my concern, obviously, is I'm trying to help my
- 9 son, but I don't want to create a dynamic for him that's,
- 10 that's impossible --
- 11 SINGER: Right.
- 12 M1: -- to manage.
- 13 SINGER: Right.
- 14 M1: Yep.
- 15 SINGER: Right, and, and, you know, we have the applications
- 16 ready. I mean, I know --
- 17 M1: Well, I want -- I want you to keep doing what you do
- brilliantly, which is coaching my kids and helping them,
- um -- helping them the way you are. I -- I'm, [06:00]
- I'm grateful for what you do, and you're, you're, you're
- 21 unique at it. The fact is that side door is a lovely
- 22 additional de-stresser, but if it doesn't -- if it isn't
- possible, it isn't possible.
- 24 SINGER: OK, gotcha. Well --

M1: You know?

```
2 SINGER: -- so I, I will keep you in play, um, and I know -- 3 M1: Yeah.
```

4 SINGER: -- you got -- you got you got

5 all those guys helpin' you, and that's cool --

6 M1: Yeah.

1

13

14

17

20

21

7 SINGER: -- and that's cool. We just, as you --

8 M1: Well, (inaudible), the, the iro-- the irony -- (laughs)

9 the irony of the whole way the system works, as I've

10 become sort of conscious of it -- I had this call with,

11 with, uh, the -- our -- knows is

interested in SC, and so he, he just gave 20 million

bucks to the school and is on the board, and he called

down to this, this guy, who's one of the development

folks, that, and just said, "Look, I want you to know who

Bill is," and da-da-da. The irony of the whole thing is

that i-it is... (laughs) The way these schools work,

particularly commercial schools like SC, you -- uh, my

19 [07:00] impression -- uh, this may be wrong; you would

know -- is it, it is so, um, commercial. I mean, you

know, it, it, it's very clear to me that if they sense

22 that I'm gonna write a check, they're gonna do what they

can do to get me in --

24 SINGER: And --

- 1 M1: -- at that school.
- 2 SINGER: And you're -- and --
- 3 M1: My son in.
- 4 SINGER: And you're right, and that's where -- that's, that's
- 5 --
- 6 M1: It's just -- it's just --
- 7 SINGER: -- why USC's become the power.
- 8 M1: -- it's... It's just (inaudible)... Well, and by the
- 9 way, you flip it around, you say if you've got 5,000
- 10 kids, effectively, in an undergraduate class, you could
- have 4,000 of them be 4.0, perfect, you know, test
- 12 scores, and still let a thousand in that are -- that are,
- 13 you know, people that are well-connected, that are gonna
- help you grow your school, and you've got an amazing
- 15 program --
- 16 SINGER: And --
- 17 M1: -- you know?
- 18 SINGER: And, and that's essentially what USC's done, right?
- 19 M1: Yeah, it's brilliant.
- 20 SINGER: Right? You got -- you know, siven his
- 21 money, and, uh, you know, everybody else is, is gi-- is
- doin' their thing. They're tryin' to hire the president.
- 23 Everybody who's --
- 24 M1: Yeah.

- 1 SINGER: -- on the board is anteing up to get the right
- president in. It's, you know, it's crazy.
- 3 M1: [08:00] Mm-hmm.
- 4 SINGER: It's crazy. So 1-- so just so you know, I don't
- 5 know if you saw Chapman, the Boulder --
- 6 M1: Yeah.
- 7 SINGER: -- and --
- 8 M1: Uh, well, he was totally excited that there was a green
- 9 checkbox next to his Chapman electronic submission.
- 10 (laughs)
- 11 SINGER: Uh, uh, absolutely. So he's done a fabulous --
- 12 M1: But (inaudible), I, I have to say, between you doing what
- you're doin' for him and with her, you know,
- 14 c-- tutoring that he's been getting, you know, and just
- 15 his writing, all that, i-it's, it's been -- it's, it's
- not been a... I mean, my memories as a kid is this was
- 17 totally torturous. It's felt OK with I mean, he
- needs some help on, um -- and he's gonna need your help
- on getting his pitch in to the Iovine and Young Academy -
- 20 -
- 21 SINGER: Yeah.
- 22 M1: -- just 'cause he doesn't man-- as you know, he's -- has
- a hard time sort of managing his time, but he's growin'
- up. I mean, he's, he's doin' a lot better than he was.

- 1 SINGER: No, he's, he's been amazing, and he's been on top of
- 2 stuff. Like, he hounds me, which is so different,
- 3 because I was [09:00] hounding him.
- 4 M1: Don't you love that? That's great.
- 5 SINGER: Yeah.
- 6 M1: Very good sign.
- 7 SINGER: No, that's good, and, and --
- 8 M1: Yeah.
- 9 SINGER: -- and I'll jump on here soon.
- 10 M1: Perfect.
- 11 SINGER: Um, I just want to get all the applications done,
- 12 but I --
- 13 M1: By the way, I got -- I got, uh, we-- w-
- 14 weirdly, he did his first, uh -- you know, his PSAT, and
- 15 then he, at time and a half, ran out of time, and was
- quite frustrated that he couldn't finish. And I called
- 17 the, the assessment -- you know, the neuros--
- 18 neurospecialist --
- 19 SINGER: Yeah.
- 20 M1: -- who had done the assessment for both and
- and she said, "Why doesn't he have double time? I called
- for double time." And his, his friggin' school -- his --
- like, she -- the woman who runs that, who's a
- lovely woman, but she sort of feels it's her job to

- 1 prevent kids from getting, you know, uh, concessions, um,
- 2 as opposed to being their advocate. So it -- it's right
- 3 there in his report, so we've gone back to her this week
- and said, "You've gotta give him the double time, and you
- 5 gotta go back to ACT and SAT and pitch him for the double
- 6 time."
- 7 SINGER: Absolutely.
- 8 M1: Um, [10:00] so we're on that with as well --
- 9 SINGER: OK.
- 10 M1: -- to help him as he gets into his test cycle.
- 11 SINGER: OK. Well, that's great. So, thanks --
- 12 M1: Yeah.
- 13 SINGER: -- thanks for takin' the call, and --
- 14 M1: By the way, uh, so you know, the, the, uh, the, the...
- 15 You know, in my experience with a guy like that who isn't
- paying his taxes, the issue the IRS always has is taxes.
- 17 They, they -- the IRS doesn't care about anything other
- than you're paying your taxes. And, you know, they tend
- 19 to be aggressive about making sure that organizations are
- doin' what they're supposed to do from a tax perspective,
- 21 but they're -- that's all they care about at the end of
- the day.
- 23 SINGER: Gotcha. Gotcha. Well, I appre--

- 1 M1: And they really -- they really -- that-that's, that's the
- 2 whole kit and kaboodle is tax.
- 3 SINGER: Well, I appreciate that, and thanks for keepin' this
- 4 between us. It's just a little --
- 5 M1: Of course.
- 6 SINGER: -- embarrassing, so thanks.
- 7 M1: No, it shouldn't be embarrassing. It is what it is.
- 8 SINGER: OK. Thanks, Bill.
- 9 M1: All right, buddy. (overlapping dialogue; inaudible).
- 10 SINGER: Take care. OK, bye-bye.
- 11 M1: Yeah.
- 12 SINGER: Uh...
- 13 (phone beeps)



22 END OF AUDIO FILE

Exhibit CCC

Page 1

```
Call Date: 2018-09-29
 1
    Call Duration: 13:40
 3
    Call Begin [ ] Call End [ ]
    Call Participants:
 4
        Rick Singer
 5
 6
        John Wilson
 7
    File Name: 2018-09-29 15-24-23 09249-001
 8
    Bates No.:
 9
10
    [00:00:00]
11
    WILSON: Hey, Rick. How ya doin'?
    SINGER: Hey, John. How are ya?
12
    WILSON: Good. You feelin' better?
13
14
    SINGER: Lot better.
    WILSON: Oh, (overlapping dialogue; inaudible).
15
    SINGER: You good? You been out of town?
16
    WILSON: Yeah, I've been out of town. Been traveling. I'm
17
18
         goin' to Europe next week, so it'll be easier to connect
19
        this week, so...
    SINGER: OK, cool. So the girls --
20
    WILSON: So, yeah --
21
22
    SINGER: -- were great.
23
    WILSON: Cool. I, I still didn't get a c-- a f-- a full
24
        debrief from 'em, but talked to _____. They, um,
```

```
they have any clarity on, on where they want to go, what
 1
 2
         majors, or still (overlapping dialogue; inaudible)?
 3
    SINGER: Yeah. Yeah, well, I mean, you have done a great job
         of, uh -- (laughs) it's so funny -- influencing 'em on
 4
 5
         what is the appropriate path to go down. What do you
 6
         think they both said? (overlapping dialogue; inaudible)
 7
 8
    WILSON:
              What, all the Ivy League schools?
 9
    SINGER: No, no, I mean --
10
    WILSON: (overlapping dialogue; inaudible).
    SINGER: -- uh, uh, uh, they want to be business and
11
12
         engineering. (laughter) I said, "So do..." I said,
13
         "Does that come from your dad?" And, of course, "Well,
14
         my dad -- they pr-- my dad's programmed us," right?
         (laughter) [00:01:00] So I said, "That's cool. So we can
15
         make all that happen." I said, "You think you might like
16
         that?" They said, "Well, my dad (inaudible), so..."
17
            (laughter) Come on! I thought they actually liked
18
    WILSON:
         science and engineering. They (overlapping dialogue;
19
         inaudible) --
20
21
    SINGER: No, I'm sure they --
    WILSON: -- science.
22
23
    SINGER: -- I -- but you're -- you've influenced them, right?
24
         (overlapping dialogue; inaudible) --
```

- 1 WILSON: Yeah, I've influenced 'em, but I want 'em to pick
- 2 what they like.
- 3 SINGER: No, definitely they get it, they get it, right? And
- 4 it's just --
- 5 WILSON: OK.
- 6 SINGER: -- it's just funny, 'cause then when kinda
- 7 interjected they're like, "Mom, stay out of it. Mom,
- 8 stay out of it." Right? It was funny. Um, but they're
- 9 both obviously great girls. They want -- in a lot of
- ways, they want to have kind of the same kinds of things
- 11 from the school. We, um -- I have a huge list of schools
- for them. Um, you know, and I said, "You guys gotta
- send me dates, because you both go to 2 separate schools,
- and and then -- and , different dates of
- days off. So some 's gonna be runnin' all over the
- place tryin' to figure out [00:02:00] how to get 1 over
- here for a day, and over here."
- 18 WILSON: Yeah.
- 19 SINGER: But, uh, that's why I need to know your dates, so I
- 20 can figure out where to go visit that would be best
- 21 suited.
- 22 WILSON: Right. Now, would they go on weekends, or gotta go
- during school days (overlapping dialogue; inaudible)?

- 1 SINGER: You gotta go on a school day, or, or a day when it's
- a school day but they're off of school.
- 3 WILSON: Yeah, OK.
- 4 SINGER: That's the ideal situation, 'cause --
- 5 WILSON: That's gonna be tougher, yeah. But the ideal isn't
- just seeing the campus on a weekend?
- 7 SINGER: Yeah, 'cause I gotta get to a point where we know if
- 8 we're applyin' ED or where we're goin', what we want,
- 9 'cause you're gonna want to know first choice, second
- 10 choice, all that stuff.
- 11 WILSON: Yeah, no, exactly. And just so I'm, I'm clear on
- 12 the, the kinda pecking order schools, and UCLAs and all
- that stuff versus -- uh, I think you said UCLAs mostly
- are in the, the bracket of, um, like, uh, Stanford -- or
- 15 not Stanford, but like, uh, USC and so forth. And what
- were the schools in that, if you did the side door? And
- 17 I'm interested about the side door and that stuff, um --
- 18 SINGER: So the side door is gonna be -- gonna happen where
- you want 'em to happen. (overlapping dialogue;
- 20 inaudible) --
- 21 WILSON: It can happen anywhere? Does it have to be
- [00:03:00] a sports side door? I wasn't clear on that.
- 23 SINGER: Well, so that's the -- that's the easiest way to
- 24 approach it, right --

```
1 WILSON: Yeah.
```

- 2 SINGER: -- because all of the coaches have... You know,
- 3 they have guaranteed spots, and you've done a good job,
- 4 you got athletic girls who got great size, they're in the
- 5 right sports, so, you know, potentially there's a sailing
- option, and potentially there's a crew option. I mean, I
- 7 don't know how good of athletes they are. They may be
- 8 good enough to be able to compete at some of these
- 9 schools, and then who knows what we have to do, depending
- on where, where the spots (inaudible).
- 11 WILSON: Mm-hmm. Yeah, so they --
- 12 SINGER: So you have --
- 13 WILSON: -- have to get that sports. Uh, what if they're not
- really that good? I mean, they can do some crew, but I
- 15 don't know they're gonna be good.
- even that good competitively at sailing. She just taught
- sailing and did sailing in, you know, (overlapping
- 18 dialogue; inaudible) --
- 19 SINGER: Right, so --
- 20 WILSON: -- Yacht Club.
- 21 SINGER: But at the end of the day, by the side door, I may
- 22 be able to go to the sailing coach and say, "Hey, this
- family's willing to make the contributions. She could be
- on your team. She is a sailor. She may not be up to the

```
1
         level you are, but she can con-- you know, you're gonna
 2
         get a benefit, [00:04:00] and the family's gonna get
 3
         benefit. So are you will-- are you interested in doing
         that?"
 4
 5
             Yeah. OK. And just -- but -- and what's the other
 6
         side? If it's not a sport, what is it? Is there any
 7
         other side doors in --
 8
              Then I have to go to -- then I have to go to
 9
         department chairs, and, and get... Some schools
10
         have a VIP list at the department chair level, so we
         could go that route, and then you can help their
11
12
         (inaudible) -- their, their program. It just depends on
13
         which school you want to go to.
14
    WILSON: OK, you know, I have this friend -- you know, one of
15
         the things I wanted to talk to you about, too, is I -- I
16
         don't know how -- I remember last time I did this, you
17
         didn't really make any money on this, on the side, this
         stuff. You just charge, and then you make a donation to
18
         the school, and that's it?
19
20
    SINGER: Well, uh, so it depends in different ways. So
21
         what's happened in the grown-up world of my world now,
22
         compared to when, you know, we did ____, was that
23
         essentially now the money goes into my foundation, as a
24
         donation, (overlapping dialogue; inaudible) --
```

Page 7

- 1 WILSON: Oh, to your foundation, not to the schools.
- 2 SINGER: Yeah, then that way the kids don't know it happens,
- 3 right?
- 4 WILSON: Yeah.
- 5 SINGER: So -- and then the other part [00:05:00] of that is
- 6 they don't chase you all the time for money. 'Cause once
- you -- you know, once you're -- they know you gave money,
- 8 that's a different story. And then what I can -- what
- 9 I'll do is I'll split the money potentially to the coach
- or other pl-- parties that are out that school that need
- 11 the money, right?
- 12 WILSON: Mm-hmm.
- 13 SINGER: So... Or it may go right to the coach, um, that's
- helping us. It ju-- it just depends on the school.
- 15 WILSON: Right. OK, so you don't actually get credit for a
- donation to the school, or get hounded for that. You
- 17 get, uh --
- 18 SINGER: (overlapping dialogue; inaudible)
- 19 WILSON: -- your donation to you, or your foundation, the Key
- 20 or whatever --
- 21 SINGER: Right, and you get --
- 22 WILSON: -- that, uh -- and --
- 23 SINGER: -- your write-off, and then you do your thing.
- 24 WILSON: OK.

- 1 SINGER: And then the kids get in the school.
- 2 WILSON: So my colleagues -- so, so you c-- you, you
- 3 (inaudible) I assume take a share of that or something.
- 4 If it's all going to your foundation, you can't take a
- 5 share if it goes to your foundation. You don't get a fee
- 6 on that, then?
- 7 SINGER: Um, I just do my fee for what I take when I do your
- 8 normal applications.
- 9 WILSON: Yeah, that's, like, terrible. I, I think, from a
- 10 business model point of view, again, I advised you last
- 11 time, (laughter) I still advise you, this is worth a lot
- 12 to people, and so, you know, to the extent you [00:06:00]
- want to make more money, I would think you would have
- some kind of fee for that. (inaudible) it's 350 to the
- foundation, plus another 20% for me for using my leverage
- and my relationships --
- 17 SINGER: Yeah.
- 18 WILSON: -- or something, no?
- 19 SINGER: Well, I'm, I'm gonna use your business model going
- 20 forward.
- 21 WILSON: I think you should. I, I really would advise you...
- 22 But anyway, I -- so then I have this, uh, close friend of
- 23 mine here who works at, uh, with me, and he's
- very well off. He's the head of, uh, one of these big

1 areas in for a lot of years. And his daughter's 2 -- wants to go to Brown next year. His concern -- I 3 said, "Well, have you thought about...?" It may be too late, 1. I don't know. Um, she's going through her 4 5 senior year right now. 6 Well, what's the relationship that that person would SINGER: have...? I mean, is that g-- is that person big enough 7 8 that people would know who that person is? 9 WILSON: Uh, yeah, probably. 10 OK, so then here would be my suggestion, to be frank SINGER: with you --11 12 WILSON: OK. 13 SINGER: -- and I'd love to help -- you know, it is late and 14 all of that. The president takes meetings all the time from influential people. She's a good gal. And she--15 Of Brown? Yeah, I don't know. 16 WILSON: Yeah, at Brown. So what I would suggest is that, 17 SINGER: 18 [00:07:00] um, he calls up her office -- they have a scheduling person for the president -- and he sets up a 19 20 meeting for he and his daughter to go meet, and she kinda meets with them, and then she'll give an indication, and 21 he'll get an idea of what it's gonna need -- what's gonna 22 23 need to be done to, to have her to go to Brown. That's -

24

- 1 WILSON: (overlapping dialogue; inaudible) the front door --
- 2 SINGER: -- that's the path I would go.
- 3 WILSON: -- like, like, \$10,000,000 kind of thing? Or that'd
- 4 be the (overlapping dialogue; inaudible) --
- 5 SINGER: No, no, no, I think it's a lot less than that. I
- 6 think it's a lot less than that. But, um, but it's first
- 7 getting the meeting with the president, and just talkin'
- 8 about -- and then also what he could do for the
- 9 university, not only financially but, you know, just in -
- he could be a, a guest lecturer. He could do, you
- 11 know, lots of different things.
- 12 WILSON: Uh-huh.
- 13 SINGER: That would be my suggestion. (overlapping dialogue;
- inaudible) --
- 15 WILSON: He wanted to do it -- so the, the other thing he had
- 16 a concern was he wanted to do it in a way his daughter
- wouldn't know. His daughter's already said, "Dad, don't
- help me with this, don't help me with that." She's very
- 19 kind of, uh --
- 20 SINGER: Well, then that's a different path, and then -- then
- 21 I may have to get involved in that. Um --
- 22 WILSON: Right, so that's --
- 23 SINGER: -- but, but it's really --
- 24 WILSON: -- the only thing he's sensitive to.

- 1 SINGER: -- it's --
- 2 WILSON: [00:08:00] His daughter's, like, really independent
- 3 that way.
- 4 SINGER: Right.
- 5 WILSON: And she's very smart. She got a 35 or 31 below
- 6 perfect --
- 7 SINGER: But, but --
- 8 WILSON: -- on the ACTs --
- 9 SINGER: -- I --
- 10 WILSON: -- and all that, but...
- 11 SINGER: No, I get it, but it -- what I would do is I would
- 12 still -- because him goin' to meet the president isn't --
- doesn't mean that she's gonna help him, but that's a good
- 14 starting point.
- 15 WILSON: Mm-hmm. Well, maybe I'll just connect you 2 by an
- email, and (inaudible) somethin' like that?
- 17 SINGER: So --
- 18 WILSON: Does that make sense?
- 19 SINGER: So I can make the -- I can call the office, and then
- what they normally... So I just had a family do that,
- and essentially what they told me to do was just, um,
- 22 have, have my family call the scheduling coordinator for
- 23 a time --
- 24 WILSON: Mm-hmm.

- 1 SINGER: -- and, and -- with the background of the
- candidates, and then they'll, they'll usually set up the
- 3 meeting. Sounds like this person's well -- high enough
- 4 up that it makes sense for (overlapping dialogue;
- 5 inaudible) --
- 6 WILSON: Yeah, he's one of the top, let's say, 12 people.
- 7 He's on the Executive Board and all that stuff like that,
- 8 so...
- 9 SINGER: Yeah, yeah, so then that makes sense.
- 10 WILSON: Now, he's, um... [00:09:00] Let's see, what else?
- 11 Uh, that's her f-- uh, what do you call it, early
- 12 decision school, I think, and all that stuff?
- 13 SINGER: Yeah.
- 14 WILSON: So she's got all that --
- 15 SINGER: Yeah.
- 16 WILSON: -- stuff goin' for her. She really loves it, wants
- to get there and all that stuff, and he's willin' to pay
- a million, 2 million. He didn't care. Um, so it's that
- 19 -- it's his last daughter, and he's, you know, pretty
- 20 well off that way. I don't know what -- um, is Brown one
- of those 350 or million...?
- 22 SINGER: Oh, it's in the millions. Yeah, yeah, yeah. No,
- 23 there's no --
- 24 WILSON: 2 million (overlapping dialogue; inaudible)?

- 1 SINGER: -- 350 (inaudible)... Yeah, there's no -- there's
- 2 no (laughs) 350... I'll -- I would have a (overlapping
- 3 dialogue; inaudible) --
- 4 WILSON: I thought that Stanford -- not Stanford -- I thought
- 5 that UCLA and USC and stuff like that was (overlapping
- 6 dialogue; inaudible) --
- 7 SINGER: Yeah, that's a different story. They're not Brown.
- 8 WILSON: No, no, that's what I meant. The, the -- there's
- 9 the 350 schools, or... (laughter)
- 10 SINGER: Yeah. Yeah, exactly.
- 11 WILSON: And everybody else jumps up to the million
- 12 (inaudible), yeah?
- 13 SINGER: Yeah, you gotta ante way up. Yeah, absolutely.
- 14 WILSON: There's not much, uh -- not much in between. Uh,
- because (inaudible), too, like, (inaudible) is just -- a,
- a bunch of them are 350s, the second tier or whatever you
- want to call 'em, and then everything else just jumped
- immediately to --
- 19 SINGER: That's correct.
- 20 WILSON: -- (inaudible) 1, 2.
- 21 SINGER: W-- yeah.
- 22 WILSON: There's no, like, 500 or 700 (overlapping dialogue;
- inaudible) --
- 24 SINGER: No, no.

- 1 WILSON: -- or...?
- 2 SINGER: No. No, because it makes no sense for them to get
- 3 involved at those schools unless they're gonna really get
- 4 after. But in [00:10:00] your case, with the girls, I
- 5 may be able to negotiate, knock it down so that, you
- 6 know, (inaudible) for 2 and figure it out.
- 7 WILSON: L-let's say, let's say they both wanted to go to a
- 8 Harvard or a Stanford, right? Obviously -- is it much
- 9 more difficult in Stanford versus Harvard, or Princeton?
- 10 SINGER: No, same -- no, but it's the same --
- 11 WILSON: Are they all the same?
- 12 SINGER: They're all the same.
- 13 WILSON: Yeah. If you wanted to do 2 at Harvard or 2 at
- 14 Stanford...? Now, I'm an alumni at Harvard. I've given
- some money, but not a lot. I've given, you know, a few
- hundred grand or (overlapping dialogue; inaudible).
- 17 SINGER: Uh, well, uh, so we just need to strategize on how
- we're gonna -- where we're gonna go, where we wanna go,
- right? 'Cause I don't think the girls have any, any idea
- 20 right now.
- 21 WILSON: Yeah, no, I don't think... They would love to go to
- 22 Stanford or Harvard. (inaudible) --
- 23 SINGER: Sure.

- 1 WILSON: -- she loves the school there, and loves the thought
- of it. Uh, loves Harvard, just from the thought
- of it. I know she's said to her friends... Uh, I just
- listen to 'em talkin' to their friends, you know?
- 5 SINGER: Right.
- 6 WILSON: "Where would you like to go?" You hear that stuff.
- 7 It doesn't have my influence... It has my influence
- 8 indirectly, and, of course, they have these big, you know
- 9 -- oh, that's a great school, just the, the brand name in
- 10 their minds, you know.
- 11 SINGER: Well, and, again, most people don't think they can
- get into Stanford so they don't even [00:11:00] bring up
- that name.
- 14 WILSON: Yeah, but they lived out there and they went --
- 15 SINGER: I know.
- 16 WILSON: -- swimming in the waterfalls.
- 17 SINGER: Right.
- 18 WILSON: They know that --
- 19 SINGER: No, no, I totally get it. (laughs) I totally get
- it. No, I get it.
- 21 WILSON: (inaudible) lived there.
- 22 SINGER: Yeah.

- 1 WILSON: So those are the 2 that are on the top. I-it's,
- 2 it's the strategy to try to get into those 2. Um, is
- 3 Harvard easier 'cause I'm --
- 4 SINGER: No, it's not that.
- 5 WILSON: -- legacy?
- 6 SINGER: But --
- 7 WILSON: That doesn't mean shit?
- 8 SINGER: Your legacy means 0, because... (laughter)
- 9 WILSON: (inaudible) my life, you know.
- 10 SINGER: John, (overlapping dialogue; inaudible) --
- 11 WILSON: Unless you're donating a building, huh?
- 12 SINGER: You've done quite well for yourself, so for a guy
- that has no legacy, you're OK. (laughter)
- 14 WILSON: Oh, shit. So legacy doesn't help at all, huh?
- 15 SINGER: Unless you're a big legacy, but you --
- 16 WILSON: Especially a big donor legacy, huh? OK.
- 17 SINGER: -- you haven't -- you haven't done that yet.
- 18 WILSON: OK, I see. That's interesting. So that doesn't
- 19 matter. Um --
- 20 SINGER: Like, what's your -- like, how much do you give to
- 21 Harvard?
- 22 WILSON: Nothing. Like, a couple hundred grand over the
- 23 years, so...
- 24 SINGER: OK. (laughter)

- 1 WILSON: So they have too much money. It pisses me off every
- time they ask for money. I say, sure, I'll give you 10
- 3 grand, you know. Stop botherin' me.
- 4 SINGER: No, I get it. I get it.
- 5 WILSON: [00:12:00] The fuckin' endowment's \$30,000,000,000.
- 6 Like, are you shitting me? (laughter)
- 7 SINGER: I know, I know, I know, I know, I get it.
- 8 I get it.
- 9 WILSON: (inaudible) give to, you know, other charities. But
- 10 anyway, that's a -- that's a whole different story. But
- 11 i-is it --
- 12 SINGER: So --
- 13 WILSON: -- a better strategy to try and split 'em across the
- 14 2 --
- 15 SINGER: Oh, yeah, I got (inaudible) strategies --
- 16 WILSON: -- try to get 'em to go to 1.
- 17 SINGER: -- I'm gonna... No, I'm gonna use athletics to help
- 18 you, because that's the easiest way.
- 19 WILSON: 'Cause they're pretty tall and strong, and I think
- they could actually... I mean, when I saw
- 21 rowing --
- 22 SINGER: No, they're good athletes.
- 23 WILSON: When I saw --
- 24 SINGER: Yeah.

- 1 WILSON: -- row on fuckin' that crew machine, I thought she
- was gonna break the machine, she was goin' so hard.
- 3 SINGER: No, she -- no, th-they en-- they, they may end up
- 4 gettin' in without even a donation, but, but you --
- 5 you'll know at least this route, we got an --
- 6 WILSON: They gotta get (overlapping dialogue; inaudible) --
- 7 SINGER: -- we got the side door route, too.
- 8 WILSON: -- though, right?
- 9 SINGER: Yeah, yeah.
- 10 WILSON: But they're not really playing crew much. They're
- 11 not doing crew, running crew.
- 12 SINGER: Right.
- 13 WILSON: So you gotta (overlapping dialogue; inaudible).
- 14 SINGER: So we'll, we'll figure it out. So --
- 15 WILSON: But what would it be, if they wanted to go to one...
- 16 Uh, is that -- it's gonna be 2 and a half (overlapping
- 17 dialogue; inaudible) --
- 18 SINGER: It's gonna be 1 -- it -- normally it's 1, 2 each,
- right? So I would have to make a deal if you wanted 'em
- both at the same school, and if they could even take 'em
- 21 at the same school, and it would cost you -- it'd cost
- 22 you a couple million dollars. Big guy like you,
- 23 [00:13:00] (laughs) that's easy.

- 1 WILSON: Yeah. Not so easy on liquidity, but yeah,
- 2 (laughter) (inaudible). You got the installment plan?
- 3 (inaudible).
- 4 SINGER: (inaudible). Listen, I gotta go to an a-- another
- 5 appointment. I just wanted to make sure I got back to
- 6 you. I'm gonna be spending some time in Boston, because
- 7 I'm gonna be reading in Harvard this year, so I'll be
- 8 able to get together with you.
- 9 WILSON: Oh, I'd love that. That'd be great. And I'm gonna
- 10 connect you -- I'll just (inaudible) -- I'll send an
- email to you, and the guy's name is _____, and --
- 12 SINGER: OK.
- 13 WILSON: -- he could become a client and do whatever, and
- 14 I'll let the 2 of you kinda email back and forth and
- 15 stuff. He'd love to do something not known to his
- daughter at Brown.
- 17 SINGER: Got it.
- 18 WILSON: (laughs) And he's got money.
- 19 SINGER: I gotcha. I gotcha.
- 20 WILSON: OK.
- 21 SINGER: All right. Take care.
- 22 WILSON: All right, take care. Bye.
- 23 SINGER: OK, bye-bye.
- 24 [00:13:40]

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1

2

END OF AUDIO FILE

Exhibit DDD

Page 1

```
Call Date: 2018-10-15
 1
 2
    Call Duration: 11:18
 3
    Call Begin [] Call End []
    Call Participants:
 4
 5
        Rick Singer
 6
        John Wilson
 7
    File Name:
                   2018-10-15 17-45-46 10126-001
 8
    Bates No.:
 9
10
    SINGER: [00:00] John. How are ya?
    WILSON: Hey, Rick. Doin' well. And yourself?
11
12
    SINGER: It's ki-- you're goin' in and out. Sorry.
13
    WILSON: I got a -- I got a bad, uh, (inaudible). It's just a
14
    SINGER: Where is tha --?
15
    WILSON: -- (inaudible) they got a big thunderstorm goin'
16
            through. Can you hear me better here?
17
    SINGER: Yeah, I can hear you better.
18
19
    WILSON: Uh...
20
    SINGER: That's much better.
    WILSON: Uh, you're pr-- busy these days, huh?
21
22
    SINGER: Yeah. We got early decision comin' up.
```

23

WILSON: Sh--

```
1
    SINGER: Uh, you're gonna be goin' through the same thing,
 2
            so...
 3
    WILSON: Oh, I know, next year, exactly. So, hey, uh, there
            were a couple topics. One was, ya kno-- my
 4
            daughter's, and, uh, making some donations now,
 5
 6
            whatever -- how that can work. And then, second, I do
 7
            want to give some time, uh, to, uh, talk a bit about
 8
            your overall, uh, pricing strategy and your economic
 9
            model, if you want.
10
    :
            Uh...
    WILSON: I don't want to force it on you. But I just think --
11
12
    SINGER: No, no. Uh, yeah. So le--
13
    WILSON: -- could be helpful.
14
    SINGER: -- well, let's -- let's start with number one. So
15
            what would be great is... You know, w-- I have a
16
            bunch of schools that we work with directly. And, you
            know, it's kind of a first serve-- firs-first come,
17
            first [01:00] served. Right? So like I have
18
            opportunity with Stanford in sailing. And I can do
19
20
            other Stanford sports potentially too. And we have
            Yale and we have Harvard. And then I can go after all
21
22
            these other schools too. But, of course, I don't know
23
            what the girls want.
```

- 1 WILSON: Right. Well, help me understand where you have first
- come, first serve and, uh... So, uh, you have, as you
- 3 said, Stanford, sailing.
- 4 SINGER: Stanford, sailing. Got Yale, soccer, um, Harvard...
- 5 WILSON: They probably wouldn't want Yale. Harvard? What, uh
- 6 -- what do you have at Harvard?
- 7 SINGER: Harvard, we could do multiple sports. I just need to
- go to them. I could actually even go to Y-- uh, you
- 9 don't want Yale, because you thought that they were
- 10 too what? Too conservative or they were too liberal?
- 11 WILSON: Too liberal.
- 12 SINGER: OK. I don't know which -- I don't know which side of
- the room, uh, you know, you -- you come from. So.
- 14 Uh, you know, we could do Stanford. We can do,
- obviousl-- USC with anything. Right? So that's an
- easy one.
- 17 WILSON: How about UCLA?
- 18 SINGER: UCLA, I could do the same thing.
- 19 WILSON: And [02:00] what about, uh...? Got, uh, multiple
- there. And what about the, um -- uh, Georgetown?
- 21 SINGER: Uh, for where?
- 22 WILSON: Georgetown?
- 23 SINGER: Georgetown, we could do the same thing. Yeah.
- 24 WILSON: Lots of mul--ple options.

```
SINGER: Yeah.
 1
 2
    WILSON: So Stanford only has 1 or 2. Just sailing? Is that
 3
            about it?
    SINGER: Um, so, uh, usually I can go t-- sailing, I can go to
 4
 5
            the crew coach, 'cause I'm friendly with her, um, and
 6
            we can, you know, d-- always do women's lacrosse. And
 7
            again, ya know, they don't have to play. They just --
 8
            I j-- that's the path I'm gonna get 'em in on.
 9
    WILSON: Gotcha. And what about Harvard? Crew, sailing.
10
            Anything else?
    SINGER: Um, sailing, crew, sometimes tennis. The key to here
11
            is that, if I were to get a deposit, 1-- you know,
12
13
            like, uh, uh, half a million dollars in the bank, then
14
            it's --
15
    WILSON: Uh...
    SINGER: -- ya know, we can figure out where they wanna go. So
16
            what I'd like to do is... I'm gonna be in town on
17
18
            November 1st and 2nd. If you can start probin' with
19
            the girls as [03:00] to potentially their -- what
20
            they're thinking, then we -- you and I could -- if
            you're -- if you can be in town one of those days -- I
21
22
            think it's a Thursday, Friday -- and we could talk
23
            face-to-face, then we could figure out, OK, what are
```

we gonna go after. So if anybody asks me for like a

24

- 1 Stanford spot and we're not sure yet, then I can call 2 you and say, "Hey, somebody wants that spot and I only have 1," or "I'm gonna get a second one," or whatever. 3 But having the money already, in advance, makes it 4 much easier. Because I gotta go with whoever's gonna 5 6 ante up. 7 WILSON: Yeah. And who do we make these, uh, checks out to? 8 And, uh, what's, uh -- uh, what's your foundation? Do 9 you have a whole wiring -- send me an email with all 10 your wiring and all, uh...? SINGER: Yeah. I can send ya a email with all the wiring 11 12 instructions. And then g-- uh, uh, your check will be 13 -- to into our foundation's account. 14 WILSON: Ri-- goes to your foundation, right. 15 SINGER: Yeah. WILSON: Uh, uh, do you have mul--? So you have multiples, uh, 16 17 at Harvard and Stanford and, uh... SINGER: Correct. 18 WILSON: You have mul--ples everywhere, it sounds like. 19 SINGER: Correct. 20 WILSON: And they don't actually have to do that sport, you're 21 22 saying. They could just go in and --
- 23 SINGER: Correct.
- 24 WILSON: -- be like the, uh -- the [04:00] scorekeeper or --

- 1 SINGER: Corre--
- 2 WILSON: -- water boy, water girl.
- 3 SINGER: Manager or whatever you want to call 'em. Yeah.
- 4 WILSON: Uh, manager, those things. OK. And you can do 2 at 1
- 5 school, as well. You could do 2 at, uh...?
- 6 SINGER: It's more difficult to do.
- 7 WILSON: Uh...
- 8 SINGER: That's why it depends on where it is. And the earlier
- 9 I know, then that gives me a chance to go after it.
- 'Cause I'll have to solicit, uh...
- 11 WILSON: Uh, let's say it's 2 at either Stanford or Harvard.
- 12 SINGER: So then, uh...
- 13 WILSON: Are those impossible or...?
- 14 SINGER: No, it's not impossible, absolutely not. It's just a
- 15 matter of I just need to know that I go-- I gotta
- start doin' my work now on that. So by you makin' the
- deposit, it makes it easier for me, because I know I
- 18 q-- uh, because what they're gonna first say to me...
- 19 If I go to them... And let's say we're doin' 2 girls
- in 1 place. Then they're gonna say to me, uh, "We're
- 21 gonna give up a spot for you. Are you --"
- 22 WILSON: Uh...
- 23 SINGER: "-- are you guaranteeing me that's she's comin'? And
- is the family guaranteeing me that they're gonna ante

- 1 up and they're gonna make a payment?" Because they
- don't want to give up a spot. And the earlier I do
- 3 it, the better.
- 4 WILSON: Gotcha. So, uh, what about Princeton? They have
- 5 multiples [05:00] too?
- 6 SINGER: 1. Usually, I could try to get a second, but it's
- 7 more difficul--
- 8 WILSON: Only 1 at Princeton. OK.
- 9 SINGER: Yeah.
- 10 WILSON: And same kinda deal, any spor--? You don't have to
- 11 really play the sport?
- 12 SINGER: That's correct.
- 13 WILSON: And you can do that -- you can also get some kinda
- chair things too, if you don't do the sport?
- 15 SINGER: Uh...
- 16 WILSON: Or, uh, sport mostly is your...?
- 17 SINGER: Um, yeah, the... It jus-- well, like it depends on
- the school. To go after a dean is a little more
- 19 difficult. With your girls, because they're athletic
- and they're big and all of that, I can sell to anybody
- 21 that they're athletic enough to be able to take 'em
- and there'll be no question.
- 23 WILSON: Yeah. Their size and, uh... So they... Yeah.
- 24 SINGER: Correct.

- 1 WILSON: Even though they wouldn't play. OK.
- 2 SINGER: R--
- 3 WILSON: And Brown? Is, uh, Brown also 2? Or wh--?
- 4 SINGER: Brown's an option too. Yeah, sure.
- 5 WILSON: A couple of 'em. OK.
- 6 SINGER: Yeah.
- 7 WILSON: Uh, and those are all -- except for like UCLA and
- 8 USC...? Those are like the 350 and the other ones are
- gonna be like 1,000,000, whatever?
- 10 SINGER: Yeah. The -- the big boys are gonna cost you over
- 11 1,000,000. And, uh, probably -- if I know early
- 12 enough, I could probably get it done at 1.5 for both
- girls. Uh, I just need to -- [06:00] I need to push
- 14 now.
- 15 WILSON: OK. So, yeah, I can get ya more now, if that helps
- you and makes everything certain. Uh, yeah. So I'll
- 17 give you at least half. Maybe I can get ya ¾ of a
- million now, if that makes it like, you know, more
- 19 certain and you're gonna say --
- 20 SINGER: OK.
- 21 WILSON: -- (inaudible) done, that's a better way to do it, for
- 22 you.
- 23 SINGER: Uh...

- 1 WILSON: It makes it better -- you're saying better with the
- 2 schools, everything, it's much better to get it --
- 3 SINGER: We-- uh, th-the --
- 4 WILSON: -- as a quarantee.
- 5 SINGER: -- the amount, uh, that doesn't ma-matter right now.
- 6 It matters you're committed. And you putting down
- 7 some money, th-that I know... John, I kn-- known you
- for years. So I know, when, uh, we get the girls in,
- 9 it's a done deal and you're gonna take care of your
- part of it, you're gonna make the payments to the
- 11 schools and the -- to the coaches. And that's what I
- need -- that's -- tha-- so I'm not worried about that.
- 13 WILSON: Uh, uh, help me understand the logistics? I thought I
- make the payment to you and you make the payment to
- 15 the school.
- 16 SINGER: Correct. That's correct.
- 17 WILSON: Oh, you said I make the payment to the schools.
- 18 SINGER: Well, no, no.
- 19 WILSON: You're (inaudible)...
- 20 SINGER: Uh, essentially, uh, it's gonna come to my
- 21 foundation... That's correct.
- 22 WILSON: And you pay. Uh, r-- OK.
- 23 SINGER: That's correct.

- 1 WILSON: Now, um, uh, how does that actually wor--? What if
- they don't actually get in? Uh, it's not a b-- uh...
- 3 SINGER: Oh, no, no. Y-you don't have to [07:00] worry
- about it. They're -- it's q-- it's a done deal. And
- 5 I'll know beforehand if it's gonna be done or not.
- 6 WILSON: Uh...
- 7 SINGER: But, uh --
- 8 WILSON: When will you know --
- 9 SINGER: -- see, uh --
- 10 WILSON: -- in the summer of next year?
- 11 SINGER: -- I need a score. See? That's why I need their
- 12 grades and scores. And that's wh--
- 13 WILSON: Yeah. They get PSATs. And they just took the PSATs.
- 14 SINGER: Correct. And then I need the real scores. That would
- be -- that's gonna -- that's gonna be able to tell me
- how easy it is to -- to flow it through or no-- and
- 17 I'm hopefu-- both girls get the same or something
- 18 similar to each other.
- 19 WILSON: They've gotten pretty similar scores all along, plus
- and minus math and English, that kinda stuff.
- 21 SINGER: Right.
- 22 WILSON: Yeah.
- 23 SINGER: Right.

- 1 WILSON: As long as, you know, like you can -- 1300 or so, is
- 2 that OK --
- 3 SINGER: Correct.
- 4 WILSON: -- is it --
- 5 SINGER: Yes. Yeah.
- 6 WILSON: -- 1300 plus? OK.
- 7 SINGER: Yeah.
- 8 WILSON: Now, do you ha-- when you say you need to know, we
- 9 have to actually have picked a school by when too,
- 10 that it's -- OK, it's 2 to Stanford, 2 at Harvard, or
- 11 1 in each --
- 12 SINGER: Well, uh, late --
- 13 WILSON: -- 1 in USC, or...?
- 14 SINGER: -- so I need that late spring.
- 15 WILSON: So late spring only. OK.
- 16 SINGER: Right. And you guys are gonna visit the schools by
- then. You'll have so much fun, uh.
- 18 WILSON: Yeah, yeah. They're g-- they haven't gone to these
- 19 place-- they've been to some of them.
- 20 SINGER: Correct.
- 21 WILSON: But they didn't go to them, look at 'em. Uh, does it
- 22 matter if they go to them and look at the -- an-and
- have this whole tour, with the [08:00] school knowing,
- or just go and look at themselves?

- 1 SINGER: No, uh. It's a --
- 2 WILSON: Want to suck up to the dean?
- 3 SINGER: -- uh, a regular tour -- regular -- regular tour.
- 4 WILSON: OK. Do those have to be done durin' the week too?
- 5 They can't do 'em --
- 6 SINGER: Yeah.
- 7 WILSON: -- on a weekend really?
- 8 SINGER: Yeah. The weekends -- you know, because they don't
- 9 have the same energy.
- 10 WILSON: No, no. I understand that. But I meant for the
- school, to meet with the whatever, faculty -- or not
- 12 the facu-- but the...
- 13 SINGER: Well, they d-- they're just gonna go on a regular
- 14 tour. They're not gonna meet, uh, faculty anyways.
- 15 WILSON: I mean, see the class, I mean-- not meet the faculty
- but see the classrooms.
- 17 SINGER: Well, if we have kids that go there. We can set it up
- 18 with 'em. If I don't kids that go, they don't go see
- 19 classes. People do--
- 20 WILSON: Oh, they do not. They just go on a tour --
- 21 SINGER: No. People are worried --
- 22 WILSON: -- of campus by --
- 23 SINGER: -- about all that. Yes.

- 1 WILSON: -- admissions? OK. So it's admissions tour, not like
- 2 a classroom tour.
- 3 SINGER: Correct.
- 4 WILSON: OK. Uh...
- 5 SINGER: Correct. Unless I have kids there.
- 6 WILSON: Uh, gotcha. OK. So if I do it early on, you might
- 7 even get, you said, 2 -- uh, 2 (inaudible) the top
- 8 ones (inaudible) 1 (inaudible).
- 9 SINGER: Correct.
- 10 WILSON: And does it really matter, though, if it's 2 at 1 or,
- 11 uh, not?
- 12 SINGER: It d--
- 13 WILSON: Ho-how much did you...?
- 14 SINGER: It makes it ea-- it makes it easier, if it isn't, but
- 15 it can be done.
- 16 WILSON: It could be done. OK. And you're pretty confident
- 17 right now, a-and all those top schools, you could get
- 18 something done, as long as they get --
- 19 SINGER: Yeah.
- 20 WILSON: -- a test score of [09:00] 1300.
- 21 SINGER: Because I'm -- I'm usin' up my spot now. And then you
- have the ne-- you're early.
- 23 WILSON: OK. Great. And then, uh... You only have like 1 or
- 24 2 spots in each of these place, though, you're saying.

- 1 SINGER: Correct.
- 2 WILSON: Or, y-- uh, you have several, depending on the sport,
- 3 you were s-- uh, 'cause like --
- 4 SINGER: Well, it depends.
- 5 WILSON: -- Harvard, you can a couple --
- 6 SINGER: Uh, uh...
- 7 WILSON: -- both crew and saili--
- 8 SINGER: Well, John, it, uh -- it depends on boy or girl, all
- 9 of that, right? Because --
- 10 WILSON: But I'm saying 2 girls.
- 11 SINGER: -- (inaudible). Yeah, usually 2 girls.
- 12 WILSON: So my t-- you can get a couple girls in each year, to
- these places. And they may --
- 14 SINGER: Correct.
- 15 WILSON: -- take both of those spots.
- 16 SINGER: Correct.
- 17 WILSON: OK. Sound like you got 20 spots. You may only have
- 18 2.
- 19 SINGER: No. Uh, right. You're crazy.
- 20 WILSON: No. It's why you need to charge a bigger premium, my
- 21 friend.
- 22 SINGER: I got it. Well, we'll have that discussion in --
- 23 WILSON: Uh...
- 24 SINGER: -- in, uh, November. How's that?

- 1 WILSON: OK. And that sounds great. So I w-- I will get
- 2 you... Send me an email with where you need to send
- 3 these funds. And so you don't care. Half a million,
- 4 whatever, is good, ¾ of a million, doesn't really
- 5 matter, you're saying, just send something to you.
- 6 SINGER: Correct.
- 7 WILSON: And then, uh -- uh, then you know we're locked in for
- 8 2. We don't know where yet.
- 9 SINGER: R--
- 10 WILSON: We'll determine that a little bit later in the year,
- maybe November. [10:00] So you have your dates? Is
- it 1 and 2, for sure? What is your schedule?
- 13 SINGER: Excuse me?
- 14 WILSON: The dates (inaudible) --
- 15 SINGER: Yeah. November --
- 16 WILSON: -- come back to Boston, uh.
- 17 SINGER: -- 1st and 2nd. Yeah. November 1st and 2nd -- it's a
- 18 Thursday, Friday -- I'll be...
- 19 WILSON: OK. Yeah. Right now we were plannin' on being out of
- town, damn it. We're gonna be in Europe. Uh, when's
- 21 the next time you're in, uh, Boston, uh?
- 22 SINGER: Uh, I'll have to figure that out. I'll let you know,
- though.

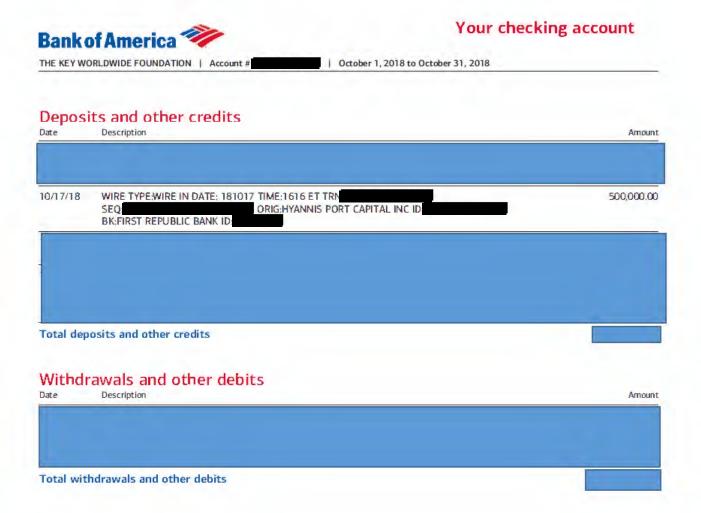
- 1 WILSON: OK. My girls'll be in town. But w-- Leslie and I
- 2 will be out, yeah.
- 3 SINGER: OK. Gotcha.
- 4 WILSON: All right. Oh, by the way, you should mark your
- 5 calendar for next Ju-July, if you want, in, uh, Paris.
- 6 Got a big birthday, July, uh, 19.
- 7 SINGER: OK.
- 8 WILSON: I rented out Versailles.
- 9 SINGER: Oh, my God. You're crazy.
- 10 WILSON: I know. A black-tie party there. So you'll have to
- 11 come.
- 12 SINGER: Uh...
- 13 WILSON: Anyway. Uh, I will -- I'll get you -- uh, I'll parti-
- 14 -
- 15 SINGER: I'll send you the -- I'll send you the w-- uh,
- information about the bank and the wiring stuff, uh,
- 17 probably in the next day or so.
- 18 WILSON: OK. That's great. It's good to hear that earlier is
- 19 better.
- 20 SINGER: Yeah.
- 21 WILSON: I'm glad we had this conversation. And then I'll have
- 22 the girls run a filter, over the next few weeks. Uh,
- 23 they could meet with you in November without us. Is
- 24 that [11:00] OK? Or would you --

- 1 SINGER: Sure.
- 2 WILSON: -- want (inaudible) with us?
- 3 SINGER: Absolutely.
- 4 WILSON: OK.
- 5 SINGER: Absol--
- 6 WILSON: So I'll have the girls plan on meeting you sometime
- November 1 and 2. Let me know the next time you're on
- 8 (inaudible).
- 9 SINGER: Will do.
- 10 WILSON: Yeah. I'd be happy to help you with your business
- 11 model. So I think you're leaving a lotta money on the
- 12 table.
- 13 SINGER: I know y-- I know that. We'll have that discussion.
- 14 WILSON: OK. So the g--
- 15 SINGER: All right, John.
- 16 WILSON: Uh...
- 17 SINGER: Thanks.
- 18 WILSON: Take, uh...
- 19 SINGER: OK. Buh-bye. [11:18]

20

21 END OF AUDIO FILE

Exhibit EEE



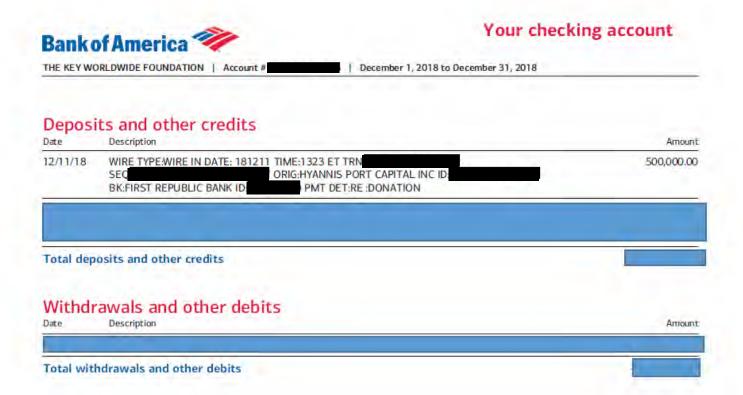


Exhibit FFF

To: Sent: 10	19-cr-10080-LTS Document 106 onn Wilson 0/17/2018 2:15:45 PM e: The Key Worldwide FOundation	6-1 Filed 04/08/20	Page 273 of 387
Yes			
John B Wilson			
President and CEO, Hyannis Port Capital Inc.			
On Oct 17, 2018, at 13:13, wrote:			
Ok, so I'm assuming you will let me know when this is to be wired, so I'll wait for further direction.			
From: John Wilson Sent: Wednesday, October 1 To: Subject: Re: The Key World			
It's a \$500k donation I am going to make this year. Tax write off and help getting into colleges.			
John B Wilson			
President and CEO, Hyannis Port Capital Inc.			
On Oct 17, 2018, at 11:58, wrote:			
I just received a text with Bank info for The Key Worldwide Foundation, what is this for?			

Exhibit GGG

- 1 Call Date: 10/27/2018
- 2 Call Duration: 05:23
- 3 Call Begin [] Call End []
- 4 Call Participants:
- 5 John Wilson
- 6 Rick Singer
- 7 **File Name:** 2018-10-27 17-13-18 10823-001
- 8 Bates No.:
- 9
- 10 SINGER: [00:00] John, how are you?
- 11 WILSON: Hey, Rick, I'm OK. I'm here in a big rainstorm in
- 12 Saudi Arabia. [laughter]
- 13 SINGER: In Saudi Arabia.
- 14 WILSON: Unusual. Yeah, I'm in Dubai.
- 15 SINGER: I didn't -- I didn't know that they, uh, had storms
- 16 like that in the desert.
- 17 WILSON: I know. It's very unusual. Very strange, yeah.
- 18 (inaudible) all this lightning. It was crazy. Anyway,
- now I'm in the car. We're heading out so I had a little
- free time.
- 21 SINGER: OK.
- 22 WILSON: What's happening?
- 23 SINGER: So I had a conversation with the Stanford sailing
- coach and, um, so I just gave the Stanford sailing coach

- 1 160,000 for his program and while we were having that
- conversation I said, "Hey, I'm hoping that this 160 that
- 3 I'm helping you with helps secure, um, a spot for next
- 4 year. Can I be guaranteed a spot for next year?"
- 5 [01:00] And he said, um, "Yes."
- 6 WILSON: (inaudible) all it takes?
- 7 SINGER: So... Uh, no, no, no. That's not all it takes.
- 8 WILSON: OK. [laughter]
- 9 SINGER: This is not TJ Maxx or Marshall's or something like
- 10 that. So, um...
- 11 WILSON: Right.
- 12 SINGER: So essentially if you're -- um, I want you to have
- first dibs, like I told you. So if you want I can
- 14 provide John Vandemoer, um, -- which I'm going to
- 15 essentially send John directly the check, to the coach.
- I can send him your 500,000 that you hired into my
- account to secure the spot for one of your girls. Um, I
- asked him for a second spot in sailing and he said he
- can't do that because he has to actually recruit some
- 20 real sailors so that Stanford doesn't --
- 21 WILSON: [laughter]
- 22 SINGER: -- [02:00] catch on.
- 23 WILSON: Right.
- 24 SINGER: OK. So --

- 1 WILSON: Yeah, no. He's got to --
- 2 SINGER: -- Stanford --
- 3 WILSON: -- actually have some sailors. Yeah.
- 4 SINGER: Yeah. So that Stanford doesn't catch on to what
- 5 he's doing.
- 6 WILSON: Right.
- 7 SINGER: So... Um, and I -- that doesn't mean I'm not going
- 8 to pursue other Stanford coaches, um, and to be frank
- 9 with you, it doesn't matter if, um, it's one of the girls
- 10 who's not a sailor. I can still put her as a sailor.
- Or, obviously, the one that is, I can -- I'll mark that
- she's a sailor because she is, but not at the level in
- which she can sail at Stanford.
- 14 WILSON: Right, right.
- 15 SINGER: I just need to know if you want me to go forward and
- secure that spot.
- 17 WILSON: Yeah, that's what I need to think. I know the girls
- were looking at, you know, Harvard and Stanford, are
- 19 their two -- you know, two tops. Anything on Harvard?
- 20 So if we did that, we're then precluded -- you know,
- 21 you've gone (inaudible) already.
- 22 SINGER: So we're not --
- 23 WILSON: You're saying once you do this you're (inaudible)
- 24 down that path?

- 1 SINGER: Well, that's what I'm trying [03:00] to get. I'm
- 2 trying to get -- that you got one and then I'm going to
- go after the other one, others at Stanford. I don't --
- 4 you know, obviously I just started here because I already
- 5 have that relationship with the sailing coach and I've
- 6 already --
- 7 WILSON: Yeah.
- 8 SINGER: -- given him 160,000. That doesn't mean I'm not
- going to go after Harvard, as well, and I probably am
- going to go after Harvard for one spot or two spots but I
- just haven't been there yet because it's too early.
- 12 WILSON: Right. So what -- uh, (inaudible) so is it, uh,
- you're committed once you make this call, you're saying?
- 14 SINGER: Excuse me?
- 15 WILSON: Would we be committed? Because I don't even -- you
- 16 know, the girls haven't been out there yet to look at it
- 17 yet. How does that work?
- 18 SINGER: No, so... No. So let -- I'll -- let -- you know,
- let me have a discussion with the coach to say when I
- 20 have to have the commitment from you guys.
- 21 WILSON: OK.
- 22 SINGER: Because that would tell you if you guys needed to be
- out there to visit or are you just going to [04:00] take
- the spot now or do we have time. I'll get back to you on

- 1 that. I just want to make sure, you know, I'm working on
- it for you and that I got the spot. I just need to know
- 3 if that's what you want me to do and I'll -- and I'll
- 4 work on the rest of it over the next day or two to figure
- out what the next parameters are. And then I'll text you
- and you can call me from, you know, the Nile with Moses
- 7 and Cleopatra and whatever you want.
- 8 WILSON: [laughter] OK. I'll be here, then I'll be in Abu
- 9 Dhabi and Dubai later in the week and then (inaudible)
- 10 after that. All right. Um -- you know, what about the
- 11 timing? Anything -- any news on the Harvard side?
- 12 SINGER: I'm just working on the Harvard side now.
- 13 WILSON: Is that likely to be in the next few weeks, too.
- Because I thought we had until spring on some of that.
- 15 SINGER: We do, we do. But I -- but I -- you know, I first
- got to worry about my kids for this year. But because
- 17 you --
- 18 WILSON: Yeah.
- 19 SINGER: -- provided me the money and I already was on the
- 20 phone with them, I'm thinking about you guys first.
- 21 WILSON: Oh, OK, great. [05:00] That's always nice of you.
- I appreciate that.
- 23 SINGER: OK. So I will --
- 24 WILSON: All right.

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Page 6

- 1 SINGER: -- get back to you on the questions you had but I
- 2 just wanted to pose this to you now.
- 3 WILSON: Right. Oh, it sounds great. Appreciate it.
- 4 SINGER: OK. So I'll get back to you --
- 5 WILSON: All right.
- 6 SINGER: -- or I'll text you.
- 7 WILSON: OK, super.
- 8 SINGER: OK, John.
- 9 WILSON: Thank you.
- 10 SINGER: Take care.
- 11 WILSON: Take care.
- 12 SINGER: OK, bye-bye. [05:23]

13

14 END OF AUDIO FILE

Exhibit HHH

- 1 Call Date: 11/29/2018
- 2 Call Duration: 04:02
- 3 Call Begin [] Call End []
- 4 Call Participants:
- 5 Rick Singer
- 6 John
- 7 **File Name:** 2018-11-29 15-25-36 12347-001
- 8 Bates No.:
- 9
- 10 JOHN : [00:00] Hello, Rick.
- 11 SINGER: John, how are you?
- 12 JOHN: Not too bad. How about you? You coming up for air
- 13 yet?
- 14 SINGER: We're coming up for air. Where are you at? Where
- 15 are you at today?
- 16 JOHN : I'm in, uh, Houston today. Yeah.
- 17 SINGER: OK, cool. Well, I'm in Boston working on your pet
- 18 project, Harvard.
- 19 JOHN : [laughter] OK.
- 20 SINGER: OK. So, um --
- 21 JOHN: How long are you in Boston for? I'm supposed to be
- 22 back there tonight.
- 23 SINGER: About 10 minutes.
- 24 JOHN : [laughter]

- 1 SINGER: I came here because I wanted to make sure I get this
- thing taken care of for you so that my phone doesn't have
- 3 the all-time record of most texts.
- 4 JOHN : [laughter] Oh, come on. I'm -- I'm being calm.
- 5 SINGER: I know. You're -- you're calm compared to some. I
- 6 get it. So here's what we got. I'm just leaving Harvard
- 7 now. I'm going to go to the airport and essentially we -
- 8 we got a spot if -- if that's what you're saying, that
- 9 wants to go to Harvard.
- 10 JOHN : Yeah.
- 11 SINGER: So I got [01:00] the senior women's administrator at
- 12 Harvard is going to give us a spot. What we have to do
- is we'll have to give, um, her, um, \$500,000. That
- money, obviously, like the others, will go through my
- 15 foundation and then I will fund the senior women's
- administrator at Harvard. And then in the spring, since
- 17 I've already paid (sp?) the 500 and now
- we'll give the senior women's administrator 500, so I got
- another deal for you. Is -- your total's going to be
- 20 1.5. 250 will come in the spring for Stanford and 250
- 21 for Harvard in the spring and we'll ha-- and we'll be
- 22 solid. We'll be done. We'll apply like a normal student
- but we'll, um, know that we're getting in in the late
- fall of next year.

- 1 JOHN : OK, great. So what is that going to be? This is
- the senior women's -- what does [02:00] she have, no team
- 3 or anything like that or...?
- 4 SINGER: She'll figure it out. Um, so it won't mean -- it
- 5 doesn't matter the sport at this point. She will figure
- it out and get it done. Um, so -- and the same thing for
- 7 -- maybe she won't have to sail but we're going to put
- 8 her through sailing and John Van de Moore. This is
- 9 actually a better play at Harvard because she will, um,
- just get her in through at-- um, athletics in one of the
- 11 sports but it won't matter. It won't matter at all.
- 12 JOHN : She (inaudible) sail actually so sailing's actually
- a logical thing. She could be even the mascot, whatever,
- but she knows sailing.
- 15 SINGER: OK, the mascot. OK.
- 16 JOHN : [laughter]
- 17 SINGER: (inaudible) the mascot. I love it. I love that
- 18 one.
- 19 JOHN : So do you need 500 now or what's the (inaudible)?
- What do you think?
- 21 SINGER: Yeah. I -- I think --
- 22 JOHN: How quickly do you need the 500?
- 23 SINGER: By next week or so.
- 24 JOHN: Next week. OK. Um...

- 1 SINGER: You have to liquidate? Is that what you have to do?
- 2 JOHN: To do it in the next week or so, yeah. I wasn't --
- 3 do you know what my -- do -- I've been doing a lot of tax
- 4 planning, (inaudible), and paying stuff, and all that.
- 5 Um...
- 6 SINGER: What is --
- 7 JOHN: It has to be before year end, right?
- 8 SINGER: (inaudible). [03:00] Uh, before year end, yes.
- 9 JOHN : All right. Let me, uh, let me try and pull some --
- 10 pull some leverage. But that sounds fantastic.
- 11 SINGER: OK. So --
- 12 JOHN : All right.
- 13 SINGER: Um --
- 14 JOHN : That's great news.
- 15 SINGER: You just -- yeah. It's great news and you got a
- discount and we got both settled. I mean, life is good
- over at the Wilson house.
- 18 JOHN : Yeah. Well, hopefully it's settled, right? I mean,
- I always -- I'm -- I'm on pins and needles here, I know,
- 20 because it's like, OK, they got to still get good test
- grades, of course, all that stuff.
- 22 SINGER: No, they got to be -- they got to be good. They
- don't have to be over the top.
- 24 JOHN : OK.

- 1 SINGER: So if they get their -- they get their 30s, you
- 2 know, in the low 30s, we're good.
- 3 JOHN : OK.
- 4 SINGER:
- 5
- 6
- 7 JOHN : Right.
- 8 SINGER: And if we can perform the same level we're great.
- 9 JOHN: Yeah, I think that's a good -- PSAT. And they
- 10 haven't taken the ACT yet. They take that (inaudible).
- OK, so it's just that kind of level. OK, that sounds
- 12 (inaudible).
- 13 SINGER: That's correct. That's correct.
- 14 JOHN : And then -- all right. Well, I really appreciate
- your help on this. Definitely. That's great news.
- 16 SINGER: No problem.
- 17 JOHN: Thanks for sharing.
- 18 SINGER: All right.
- 19 JOHN : All right.
- 20 SINGER: Enjoy. I'll --
- 21 JOHN : Thanks.
- 22 SINGER: I'll wait to hear back from you.
- 23 JOHN : OK, great. Thank you.
- 24 SINGER: OK, thanks [04:00]. Bye-bye. [04:02]

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1

2

END OF AUDIO FILE

Exhibit III

Notes (207)

-11	(207)	Note	Deleted
1	Time Created:	Note	Deleted
'	3/7/2019 11:47(UTC-5) Modified: 3/7/2019 11:48(UTC-5)		
2	Created: 2/25/2019 19:46(UTC-5) Modified: 2/28/2019 16:37(UTC-5)		
3	Created: 2/21/2019 02:07(UTC-5) Modified: 3/7/2019 14:38(UTC-5)		
4	Created: 2/16/2019 16:02(UTC-5) Modified: 2/17/2019 10:36(UTC-5)		
5	Created: 2/7/2019 17:06(UTC-5) Modified: 2/7/2019 17:06(UTC-5)		Yes
6	Created: 2/7/2019 15:01(UTC-5) Modified: 2/7/2019 15:01(UTC-5)		
7	Created: 2/6/2019 15:53(UTC-5) Modified: 2/6/2019 16:01(UTC-5)	Title: USC is investigating Donna Heinel to s Summary: No record of you paying USC anything Source: Notes Body: USC is investigating Donna Heinel to s No record of you paying USC anything So you are clean Prepare you if someone calls you Focused on Donna and no incentive to move this forward. It is all about Donna. Do not disclose this to anyone as Donna told me in confidence Acknowledge money paid for Michael and payment went to my foundation so you are in the clear.	
8	Created: 2/2/2019 01:00(UTC-5) Modified: 2/2/2019 01:10(UTC-5)		
9	Created: 2/1/2019 14:52(UTC-5) Modified: 2/1/2019 14:52(UTC-5)		

10	Created: Case 1:19-cr-10080- 2/1/2019 14:51(UTC-5) Modified:	LTS Document 1066-1 Filed 04/08/20 Page 290 of 387	Yes
	2/1/2019 14:51(UTC-5)		
11	Created:		Yes
	Created: 2/1/2019 14:50(UTC-5)		
	Modified: 2/1/2019 14:50(UTC-5)		
40	14:50(UTC-5)		
12	Created: 1/31/2019 22:24(UTC-5) Modified: 2/7/2019 17:34(UTC-5)		
	Modified:		
	2/7/2019 17:34(UTC-5)		
13	Created: 1/30/2019		
	23:52(UTC-5) Modified:		
	Created: 1/30/2019 23:52(UTC-5) Modified: 1/30/2019 23:54(UTC-5)		
	, , , , , , , , , , , , , , , , , , , ,		

4.4	La 11 Casa 1:10 or 10090	WETS Decumost 1066: 1: Filed 04/09/26 Dago 201 of 297	
14	1/30/2019	HuiteSeteDeachment 40066k1id roiled 04/08/2014Page 291 of 387 Summary: up twice Source: Notes	
	22:26(UTC-5) Modified:	Source: Notes Body: Peter Sartorio In 2014total 15k did not work with them in 2014 - shows up twice	
	1/30/2019 22:39(UTC-5)	Manuel Henriquez 15k twice why	
	22.39(010-3)	paid for help guidance off waitlist	
		just help with younger daughter pulling out of regular school	
		Sidoo investment 99,990 twice	
		75 in and 72,350 taken out??	
		John Wilson 20k nothing to do with USC plus donation to USC program for real polo player Joey chen twice on list	
		50k never went or got into Gtown - why 50 should be 300k	
		50k no testing or college bribe	
		water polo player to USC polo	
		250k Gtown manager great grades scores 2.5 years manageraaaw	
15	Created: 1/30/2019		Yes
	18:30(UTC-5)		
	Modified: 1/30/2019		
40	18:30(UTC-5)		
16	Created: 1/30/2019		
	10:58(UTC-5) Modified:		
	1/30/2019 18:31(UTC-5)		
17	Created:		
17	1/30/2019		
	10:19(UTC-5) Modified:		
	1/30/2019 10:20(UTC-5)		
18	Created:		
	1/29/2019 14:47(UTC-5)		
	Modified: 1/29/2019		
	14:49(UTC-5)		
19	Created:		
13	1/29/2019		
	14:45(UTC-5) Modified:		
	1/29/2019 15:01(UTC-5)		
20	Created:		
	1/27/2019 23:44(UTC-5)		
	Modified: 1/27/2019		
	23:59(UTC-5)		
21	Crostadi		
21	Created: 1/23/2019		
	01:06(UTC-5) Modified:		
	1/23/2019 01:07(UTC-5)		
22	Created:		
	1/22/2019 00:17(UTC-5)		
	Modified: 1/22/2019		
	00:17(UTC-5)		
23	Created: 1/16/2019		
	23:45(UTC-5) Modified:		
	1/16/2019 23:52(UTC-5)		
	20.02(010-0)		

	Coop 1:10 or 10000	II TS Decument 1066 1 Filed 04/00/00 Bere 202 et 207	
24	Created: Case 1:19-cr-10080 1/13/2019 10:43(UTC-5) Modified: 1/20/2019 22:35(UTC-5)	LTS Document 1066-1 Filed 04/08/20 Page 292 of 387	
25	Created: 1/9/2019		
	15:28(UTC-5) Modified: 1/9/2019 15:37(UTC-5)		
26	Created: 1/5/2019 15:57(UTC-5) Modified: 1/5/2019 16:02(UTC-5)		
27	Created: 1/4/2019 13:22(UTC-5) Modified: 1/4/2019 13:23(UTC-5)		
28	Created: 1/2/2019 16:43(UTC-5) Modified: 1/2/2019 17:14(UTC-5)		
29	Created: 1/1/2019 16:55(UTC-5) Modified: 1/1/2019 16:56(UTC-5)		
30	Created: 12/31/2018 12:56(UTC-5) Modified: 12/31/2018 12:57(UTC-5)	Title: Donna confirming 400 we paid 120 Summary: Jovan tuition at Loyola for help that has happen Source: Notes Body: Donna confirming 400 we paid 120 Jovan tuition at Loyola for help that has happen	
31	Created: 12/30/2018 15:16(UTC-5) Modified: 12/30/2018 15:17(UTC-5)		

32	Created: Case 1:19-cr-10080+	LTS Document 1066-1 Filed 04/08/20 Page 293 of 387	
	23:46(UTC-5) Modified:	LTS Document 1066-1 Filed 04/08/20 Page 293 of 387	
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39	Created: Case 1:19-Cr-10080- 12/14/2018 16:10(UTC-5) Modified: 12/14/2018 16:11(UTC-5)	LTS Document 1066-1 Filed 04/08/20 Page 294 of 387	
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45	Created: Case 1:19-cr-10080 11/30/2018 10:52(UTC-5) Modified: 11/30/2018 15:35(UTC-5)	Macfarlane Macfarlane Hodge Hodge - memo Laura	
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46	Created: 11/28/2018 19:26(UTC-5) Modified: 11/28/2018 19:27(UTC-5)		
47	Created: 11/28/2018 15:08(UTC-5) Modified: 11/28/2018 18:50(UTC-5)		
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62	Created: Case 1:19-cf-10080 10/5/2018 22:03(UTC-4) Modified: 10/6/2018 00:18(UTC-4)	ELIS Document 1066-1 Filed 04/08/20 Page 297 of 387
63	Created: 10/1/2018 12:27(UTC-4) Modified: 10/11/2018 19:41(UTC-4)	Title: Sept 29 Summary: Call with John Wilson about the side door plus intro to his friend about helping at Brown for 2019 Source: Notes Body: Sept 29 Call with John Wilson about the side door plus intro to his friend about helping at Brown for 2019
		Oct 1
		Called Laura - update on weekend text and call with John Wilson on side door
		Called Michelle Janavs confirmed going through subco and 50k payment made once she gets her initial letter of acceptance and the rest of the process
		Requested expenses from Oct 1 till Oct 4 for and went to get a copy of cashier check to Niki Williams
		Called explained USC acceptance and 50k payment once conditional Letter sent
		Oct 2
		Loud and abrasive call with agents. They continue to ask me to tell a fib and not restate what I told my clients as to where there money was going -to the program not the coach and that it was a donation and they want it to be a payment. I asked for a script if they want me to ask questions and retrieve responses that are not accurate to the way I should be asking the questions. Essentially they are asking me to bend the truth which is what they asked me not to do when working with the agents and
		raised her voice to me like she did in the hotel room about agreeing with her that everyone Bribed the schools. This time about asking each person to agree to a lie I was telling them.
		Spoke to which is a referral from Gordon Caplon. They want to nail Gordon at all costs. told me his daughter is a good runner 19 minute 3 mile good enough for recruited walk on or wank on to Wash U and Cornell. Explained the side door but very late and I probably could not do it at this stage.
		The agents told me to get him to take another school I had a relationship just to entrap him despite him never asking for any other school.
		When I told them Gordon texted me that did not get extended time and the reasons why they still wanted me to ask him for a payment to take the SAT through WHCP even when he was not approved just to nail him. I said that is ludicrous as he will not entertain because she was not approved.
		Spoke with John Vandemoor Stanford Sailing- explained out but I would provide 100-200k to him as requested by the agents instead of the program as I would say normally and reiterated that I have him 500k for Molly.
		Spoke to Igor and confirmed receipt of Subject Tests and followed agents request to confirm Mark's time to show up- where he finishes the test- where Igor would be and the 10k payment to Igor and addressed to WHCP
		Spoke to Agustin- he wanted to know I was backing as hard as anyone else. I confirmed I spoke to Donna Heinel and will be admitted by the 2nd week of Nov- spoke about the fake photo I put on her profile.
		Spoke to Donna Heinel about and going through Subco on Thursday which is now tomorrow- asked about Agustina and she said by 2nd week of Nov. also as requested by agents asked her to put detail on her 20k invoices being sent to the foundation
		Oct 3
		Call with and and - told not to call Donna Heinel till Friday. Asked to wire 300k to Bank America in Boston so I can pay John Vandemoor 100k on Friday and Igor and WHCP 10k based on my calls from Oct 2.

would call me at 3:10. FBI wants me to offer other schools if he asks and -there not be at this time Spoke to go - either Cornell or Wash U are top choices- I explained what I can do at this point including side door and maybe other schools Call with the agents. Discussed my in person wire with Went to the bank to wire 300k - routing number wrong but called agents to get the right one. or I hope it recorded - dad and I spoke after volatile session with er process with SC and paying 50k to Donna and Women's Athletic sand other. Recorded Went back the Program after final letter. He balked and is going to go forward with schools SMU, Santa Clara LMU USD etc... dad Mike thinks parents legacy and new test score if he gets 33+ can start at or play for right now- TCU, may get in on his own to USC since Asked for start time of 9:30-10 since I am flying overnight to work out since I am taking the last flight to SFO. But. O they balked Oct 5 Went to Bof A with and Hollywood College Prep c/o or - got two 10k cashiers checks made out to Mark Riddell and West Then walked to the Post Office from the bank and addressed the envelopes to insert the checks, the agents took pictures of the envelopes and checks. I paid for postage and mailed through the mail person behind the desk. Met with Explained I believe I had Mark take the SAT for both Sidoo kids in Canada Made a series of successful phone calls ALL CALLS stated I was in Boston to set the stage Michael Center UT Tennis coach created a fictional tennis player that was a 2-3 star with a 3.7 and 1300 SAT Asked about our last arrangement- gave about 90k - 15-30k to Men's Tennis and 60k I brought to him in cash. Asked how the Bar Mitzvah was that part of cash was paying for which he reiterated. Asked for something similar to the past financially for an upcoming junior. We agreed to get back to each Grea Abbott Left a voicemail thanking him for the 75k and that we will achieve 750+ on the Subject Tests tomorrow in LA. Marcia Ahhott Called to check in and make sure she got in ok. Explained Mark the Proctor and Igor the test administrator are ready to go. She said she would be there at 7:45 and be over in 4 hours. Checked in and Mark informed me all is good. He will score over 750 and go for perfect on the Math and Lit Tests and that I sent the 10k today Igor Divorskiy Connected and checked in while letting him know the 10k check was on its way. John Vandemoor Left a voicemail to say call me to discuss his request for 160k to pay coaches. Asked for a phone call John texted later in the day when I was on the plane to say he was available to speak. I reaffirmed that the 160k wire to him could be a down payment on a kid the following year. Reaffirmed with his ok that we would only pay 340 next year for an sailor. Donna Heinel Called her back based on her text she sent after the Sub Committee meeting on Wednesday were admitted. She agreed for the 50k Dona stated that both and Isabel payments to come at a We spoke about the difficulty of getting Isabel in but her SAT score and her learning disabilities helped persuade the committee. Michelle Merage Called her and explained got into USC via Beach VB. Spoke about having taken the SAT the way we did was the best investment made because that helped her get over the top with her grades being low but scores high and learning differences sold it

Let jealousy know that

that she has the money available now.

rrom others and payment will occur in a while not right away

got in as a soccer player. Told to keep things quiet because of the

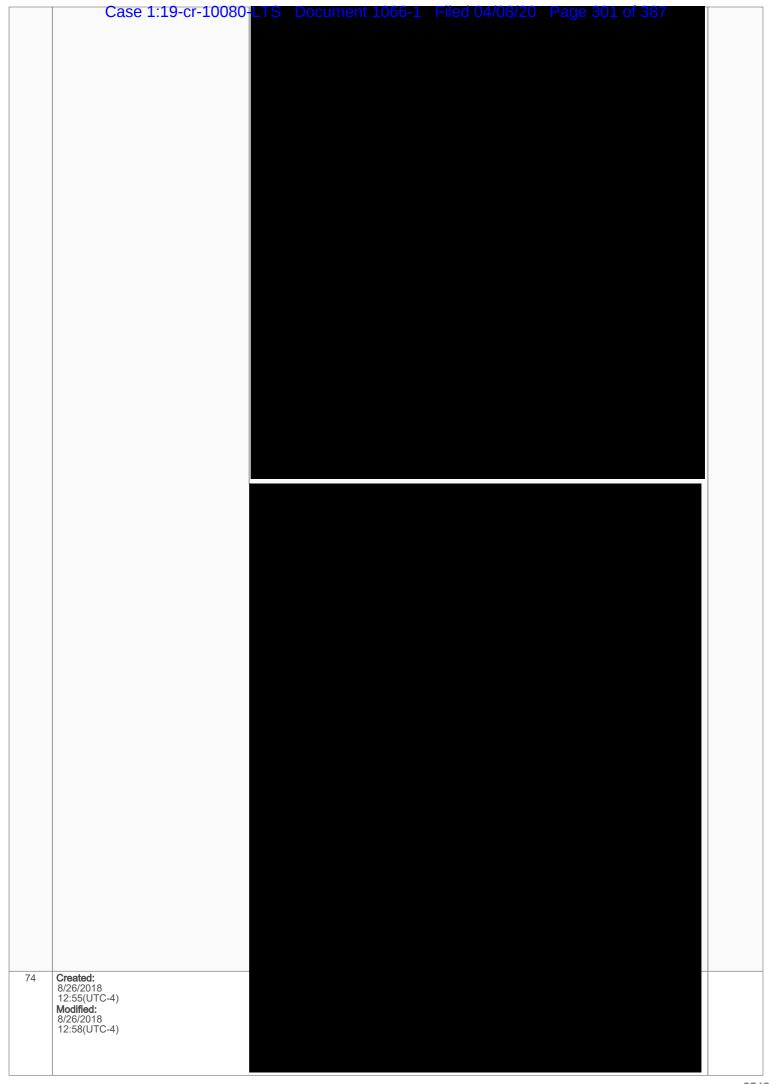
Explained that we have Williams, Amherst, Georgetown in the mix. Asked her if she would go over a million dollar investment. She thought I meant 1.5-2 million. I told her 1.1 and she fine no problem and

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testing scam.

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		Spoke about next steps internally with and and Timing of Letter of Intent for a 25 percent	
		scholarship on Nov 14. Soon thereafter we could get some of the money.	
		I would call Ali and or Jorge to make sure all is set - 100k to Jorge, 25k to Ali and 50k to	
		Called and left a message to get an update on the process	
		Called to ask for the address where I could send the 50k check for a referral. Spoke about Williams and Amherst for and mom willing to go a million dollars.	
		Returned his called about his daughter. Reaffirmed the side door for daughter to attend USC.	
		with and	
		I explained that got approval from to give his spot to Because Gtown is Early Action you cannot apply to Gtown early and yale early.	
		They want to push to get money out of the early before acceptance to Yale. I said no way as he will not have an acceptance till April 1 at Yale why would he pay now?	
		Bill McGlashan	
		Spoke about the SAT but want friends are helping not only to get into the Dr Dri program but now helping get into USC. So nothing her but SAT.	
		Gordon Caplon - keep going back to him and daughter on the Testing. I explained again is not eligible but they want to get money now as a deposit.	
		Oct 7 - Martin Fox texted he wanted me to know that Michael Center called him and wanted to know why I did not call him first to set up the next deal	
		Oct 8	
		Conference Call with and and FBI and asked to call Mark Riddell and Igor Ask to have a wire for Huneeus family.	
		Call Mark and Igor to confirm test with Abbot went well	
		Told about Martin Fox text	
		Brought the wire into the Huneeus home. Spent time with Agustin- we spoke about admission to USC and the SAT	
		Agustina came in later and we rehashed my conversation about attending and getting into USC.	
		Oct 9	
		Called the agents and reported back on Huneeus wiring conversation	
		Was asked to make 4 calls , Marci Palatella and .	
		Called and spoke about getting new introductions of Chinese families - rehashed s's enrollment and nappiness at Stanford using Sailing and a fake profile for 6.5 million	
		Felicity Huffman called me - I confirmed Monday's meeting with and family to do applications	
		Spoke with the who was the facilitator for acknowledged not a strong soccer player and not playing- not a client of her firm.	
		Spoke to Marci Palatella about Doing great lucky we did SAT and made a payment to get in. Worth the money she said.	
		Called left a vm	
		Oct 10	
		Call with and team	
		Asked to call Bill Ferguson and Martin Fox Call	
		Oct 11	
		Asked to call Gordon Caplon	
		Tried by phone and text- sounds by the ring he is in China	
		Spoke to Gordon and he told me theyappealed again for 100 percent time. We spoke about if could get into CMC USC and Wash U if she got 27-29 ACT - I said yes because of ability. He stated he was going to donate to whatever school she goes to so why not side door to confirm acceptance.	
		Got a text from Felicity Huffman - Monday does not work so I have to drive an extra day up and back to appt at 11:30 Tuesday so the agents can wire me for Felicity and Called the agents and got approval that they could be there too.	
0.4	Onested	Texted and got a reply that he will be in China for another 2 weeks.	
64	Created: 9/30/2018 22:52(UTC-4) Modified: 9/30/2018 22:52(UTC-4)		
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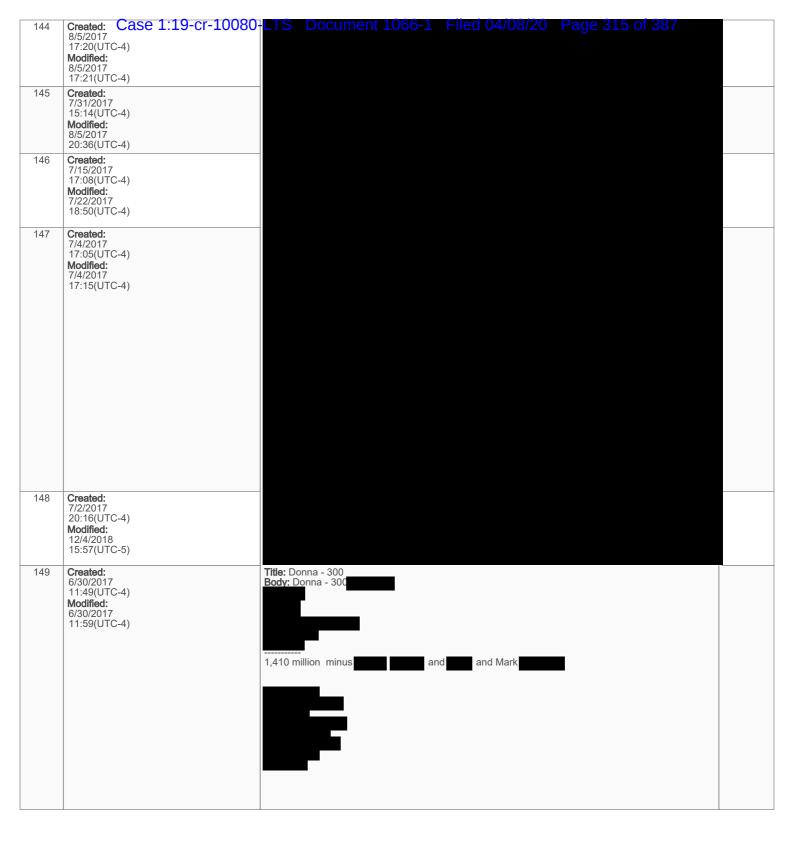
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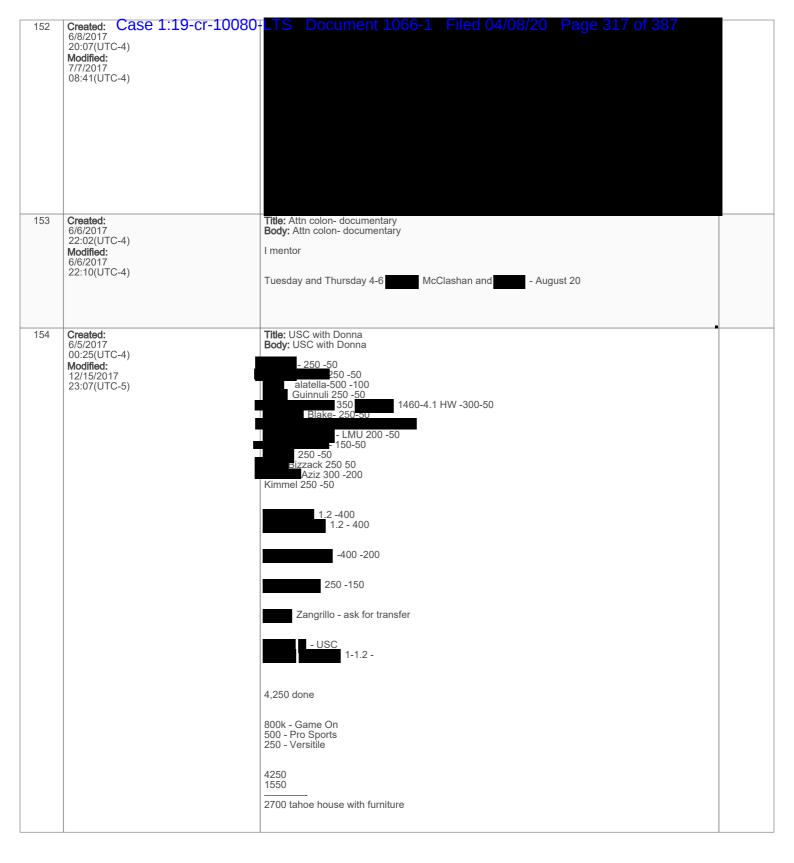
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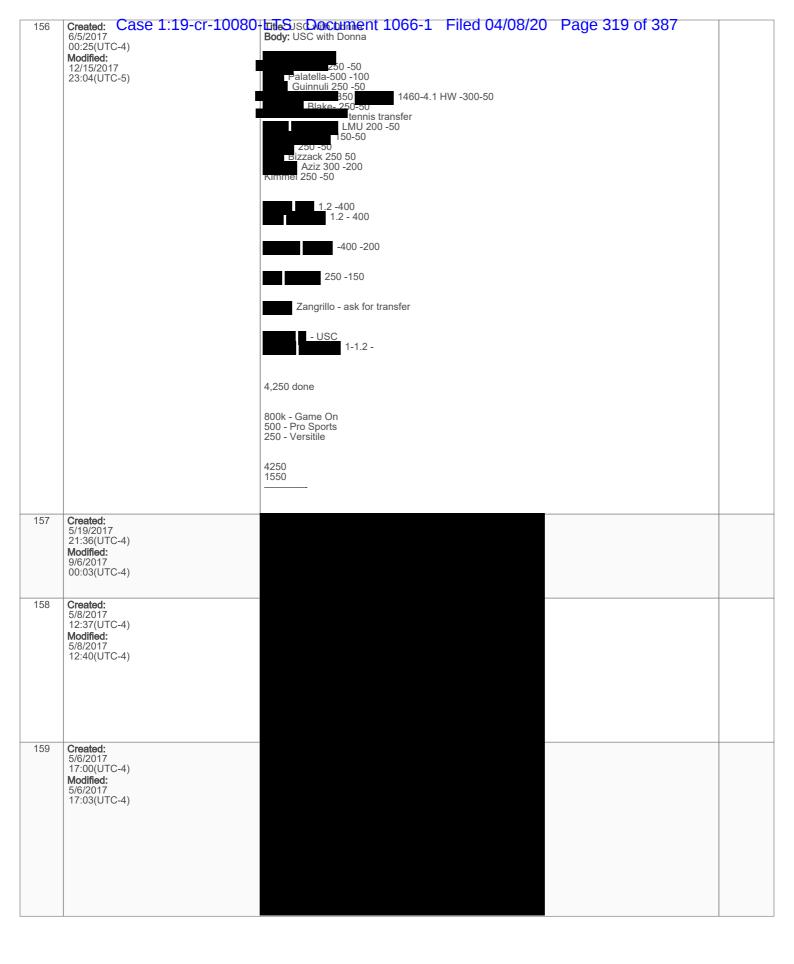
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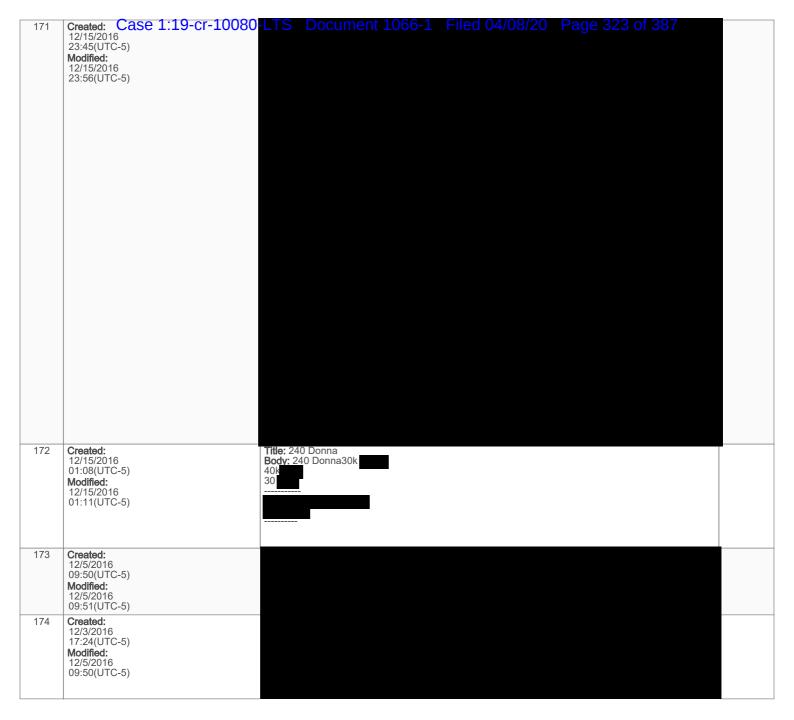


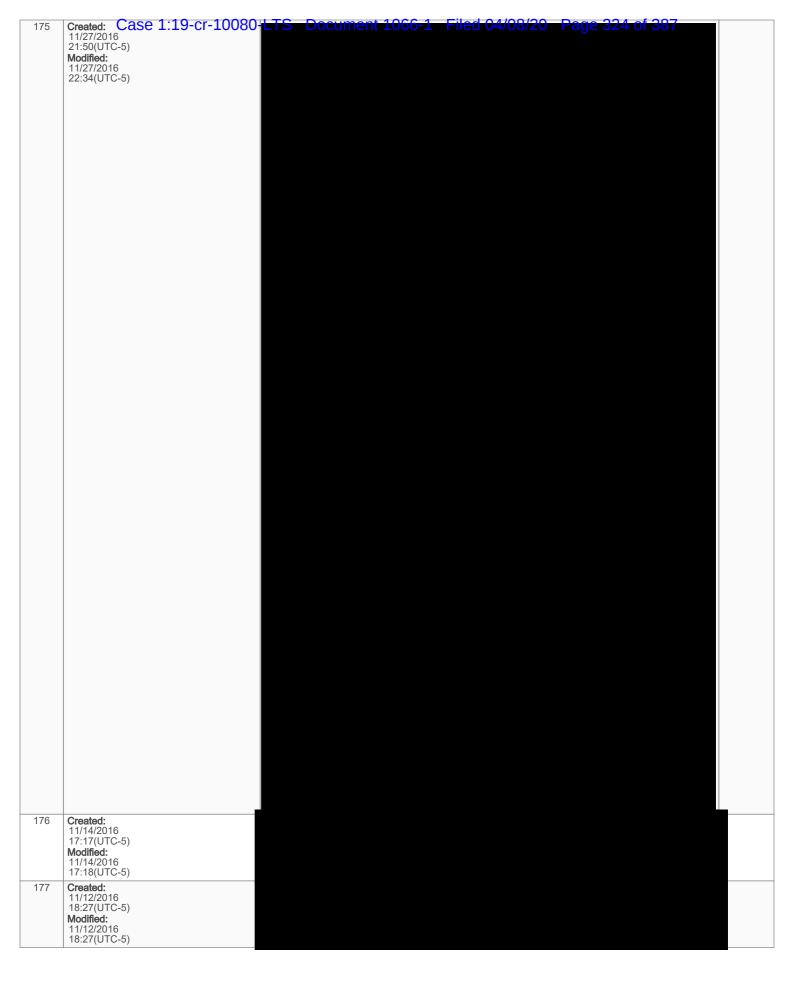


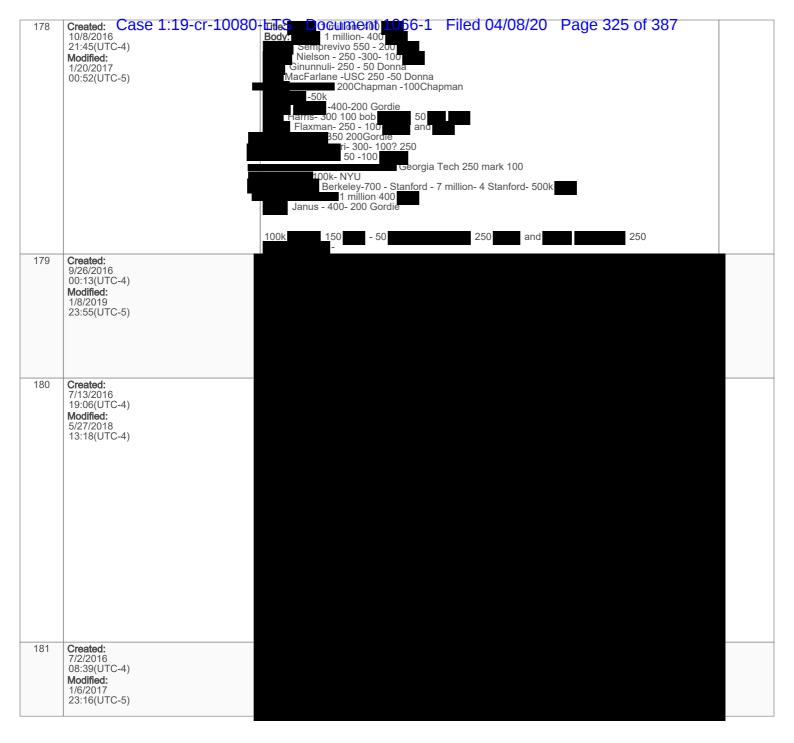
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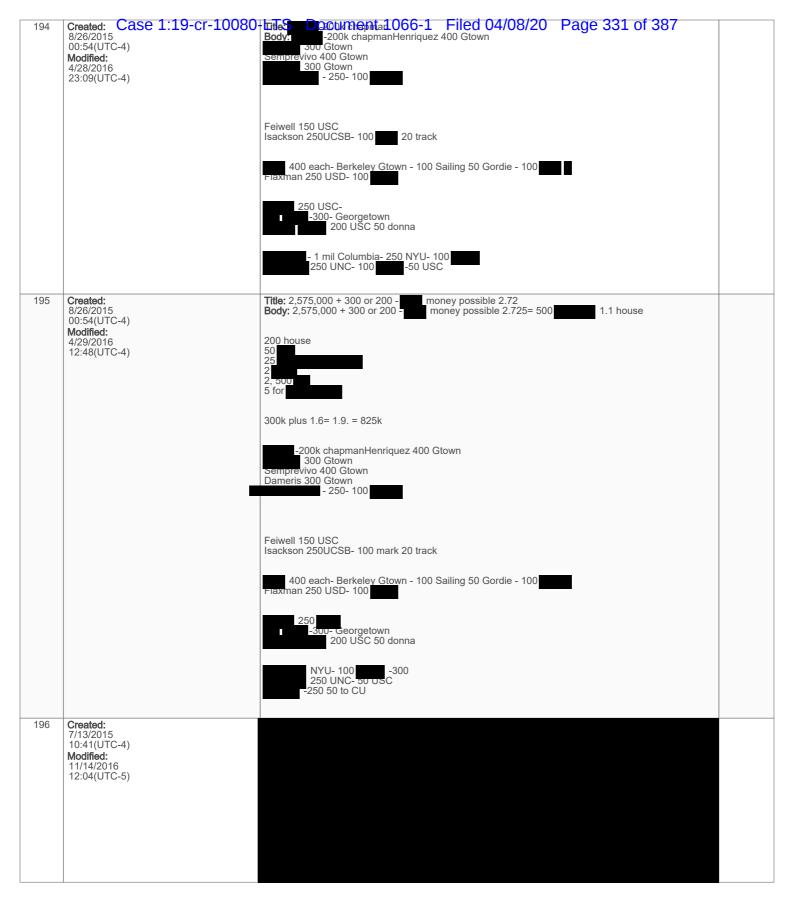
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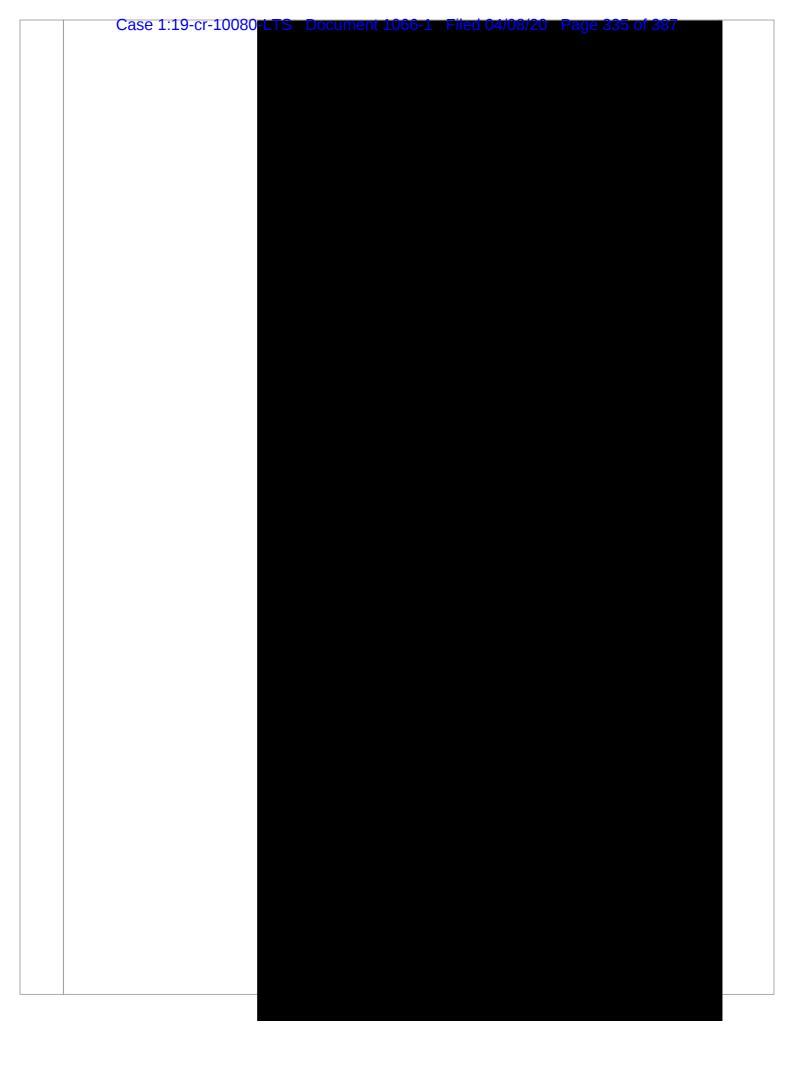


Exhibit JJJ

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Exhibit KKK

1			
1	UNITED STATES DISTRICT COURT		
2	FOR THE DISTRICT OF MASSACHUSETTS		
3	UNITED STATES OF AMERICA,)		
4) Plaintiff,)		
5) V.		
6	DAVID SIDOO, GREGORY COLBURN,)		
7	AMY COLBURN, GAMAL ABDELAZIZ,) DIANE BLAKE, TODD BLAKE,)		
8	I-HSIN CHEN, MOSSIMO GIANNULI,) Criminal Action ELIZABETH HENRIQUEZ, MANUEL) No. 1:19-cr-10080-NMG		
9	HENRIQUEZ, DOUGLAS HODGE,) MICHELLE JANAVS, ELISABETH)		
10	KIMMEL, LORI LOUGHLIN, WILLIAM) McGLASHAN, JR., MARCI PALATELLA,)		
11	JOHN WILSON, HOMAYOUN ZADEH,) ROBERT ZANGRILLO,)		
12	Defendants.)		
13)		
14	BEFORE THE HONORABLE M. PAGE KELLEY		
15	UNITED STATES MAGISTRATE JUDGE		
16	INITIAL STATUS CONFERENCE		
17	7 2 0010		
18	June 3, 2019		
19	John J. Moakley United States Courthouse		
20	Courtroom No. 24 One Courthouse Way		
21	Boston, Massachusetts 02210		
22			
23	Linda Walsh, RPR, CRR Official Court Reporter		
24	John J. Moakley United States Courthouse One Courthouse Way, Room 5205		
25	Boston, Massachusetts 02210 lwalshsteno@gmail.com		

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              THE COURT: Good morning. Okay. That's everyone.
              All right. So I have the parties' joint initial
 2
     status report, which is 388 on the docket, and I've read it.
 3
     And what I think I'll do is just go through the matters that
 4
 5
     are here, and if anyone wants to be heard on any particular
     issue, just try to stand up and start talking.
 7
              So with regard to the pending discovery requests, I
 8
     understand the parties are conferring on more comprehensive
 9
     indices, and I think I'll just leave it up to the parties to
10
     keep talking about that.
11
              Anyone want to say anything about that?
12
              (No response.)
13
              THE COURT: Okay. So with regard to number two,
14
     additional discovery, I know the Government has its Brady
     obligations, and I think they understand those. If someone
15
     would like to be heard on why they think a certification is
16
     necessary, I'm happy to hear you.
17
18
              Yes?
19
              MR. KATZ: Good morning, Your Honor.
20
              THE COURT: If we could just have everyone identify
21
     themselves just for the record.
22
              MR. KATZ: Sure. Aaron Katz for Elizabeth Henriquez.
23
     I think I probably speak for many of the defendants, if not all
     of them here.
24
25
              I think the issue is that the Government may have a
```

different conception of what constitutes Brady in this case as the Defendants. Normally, you know, you get 302s. You see the interview reports. We can make the call on our own about whether certain information is exculpatory both as to guilt or punishment and sentencing, which also comes within the definition of Brady.

Here during the meet and confer, and, Mr. Rosen, I apologize if I am misstating anything, but part of our conversation was about interviews the Government may have had with other parents that were clients of Rick Singer that have not been charged in this case, and particularly whether any of those parents told investigators, told the prosecutors that Rick Singer essentially told them that their money was going to be going to athletic programs or to schools and not in them -- in the pocket of a coach who had been bribed and corrupted.

If Rick Singer was telling other parents that the money that they were giving to Key Worldwide was going to go to the athletic programs, we think that's exculpatory. I think that goes to the heart of one of the critical elements of the honest services fraud charge, which is whether someone has actually been bribed in exchange for breaching his or her fiduciary duty.

We have seen already some e-mails from Rick Singer that did make such representations to certain parents who have not been charged in this case, but we think that there's going

to be more of that in 302s. And the new policy at the office apparently is that we are not going to get 302s unless the Government determines if there is Brady in them. Again, I don't question that the prosecutors understand their Brady obligations. If there's something that's exculpatory, they have to produce it. Mr. Rosen represented that they are not going to be sitting on Brady until we get 30 days out from trial; they are going to produce it on a rolling basis. And we appreciate that very much. But I do think that there is going to be a difference of opinion, a significant one, about what is Brady and what is not. And a good faith disagreement but one that's critically important.

THE COURT: I'm still not sure -- I guess this is the reference including the Government's policy regarding FBI reports on the first page?

MR. KATZ: Correct.

THE COURT: Okay. I'm still not sure why, if the Government doesn't think certain materials are Brady, why having them certify that they have given you all the Brady would really cured that. I mean, I think I'll address your point, but I still don't know that the certification is necessary, but --

MR. KATZ: You know, it may not be. It certainly won't be sufficient to resolve this disagreement. I mean, this may be something where the future discovery requests that go to

Your Honor are going to actually tease out what's Brady. What also makes this case a little bit unique, as I read the indictment, it's a three or a four object conspiracy count, and so I think the prosecutors may feel like, well, we have got powerful evidence on one of the objects, and this exculpatory evidence only goes to another object that doesn't really affect guilt on the charge. But it does go to certainly sentencing, you know, if there were a conviction. But also there are certain legal and sort of legal infirmities arguably of certain of the objects, and those are different, right? And so all of the exculpatory evidence on any of the objects is critically important to have. But if Your Honor would like to deal with that with the discovery requests after we set deadlines, that may make more sense. That may be what we have to do.

THE COURT: Okay. Does anyone else want to be heard on this point that Mr. Katz was just raising?

Okay. Mr. Rosen?

MR. ROSEN: Just briefly, Your Honor. The Government is aware of its obligations and will continue to review and disclose our discovery as a trigger for a massive amount of discovery, I think approximately 3 million pages of discovery, along with the wiretap calls, consensual calls, you know, millions of e-mails, lots of documents, applications and everything like that.

First of all, a certification is completely unworkable

in terms of, you know, the nature of discovery can change as the case progresses as more is discovered. We are aware of our obligations. We are working through them. It's good enough in every other case. There's no, I don't think, any rule that requires some type of Government certification. Even there, defense counsel, although there's different opinions on what constitutes a bribe or not, has not identified any exculpatory evidence. It doesn't -- it simply doesn't matter whether the money went to a coach's program or whether it went to a -- the coach's pocket directly. A bribe is simply a quid pro quo with the intent to defraud, and all the Defendants have been charged with that.

I think the best practice is for Defendants first to review the discovery and then we can meet, confer. We are very good about getting back to Defendants. And if they have, you know, an issue later on, we can address that, but we're not going to hand over all of our 302s willy-nilly because the Defendants feel like they have some theory about why certain things could be exculpatory to them or not.

MR. WEINBERG: I think Mr. Rosen has just put his finger on one of the chasms between the Government's understanding of Brady and the defense. If money went to a school, whatever the discussions, it's not a bribe, at least not a bribe within the ambit of the Government's allegations in this case that there were bribes paid to specific people for

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specific performance or a breach of services. So we would want to reserve for a time that Your Honor felt it was appropriate to tee up and crystallize this issue where we claim that is exculpatory evidence and the Government has just said it's not. THE COURT: Okay. That was Mr. Weinberg speaking. Since we don't have a stenographer here, we have just got to identify yourself. MR. WEINBERG: Sorry, Judge. THE COURT: Okay. I hear you all, and I think it's a good idea what everyone is saying, that we wait and let this issue kind of develop, and then I'm happy to take it up. And it may be we want to take it up before the next status hearing, but I think -- you know, I would just urge the Government if the Defendants can show you any arguable reason why they think something is exculpatory, you might as well turn it over if you can bring yourself to do that, but otherwise, I'm happy to hear it. So -- okay. So let's just get into the discovery and if you want to try to further persuade the Government, if that doesn't work, then come back. Okay? MR. WEINBERG: Thank you. THE COURT: Okay. I'm not going to require the Government to certify at this time.

With regard to the timing issues, I know the rules set

pretty firm deadlines on discovery motions, but I'm just not

going to do that because there's so much discovery, and I know the Government is producing it on a rolling basis here. And I think as issues arise and you want to be heard on them, I'm happy for you to request it from the Government and then file a motion as the rules require. I do really think I'm going to strictly enforce the rule that says you have to confer before filing motions, so please do that.

And I agree with the proposal at the bottom of Page 2 that Defendants can confer and exchange letter requests, and there are no deadlines on that at this time. I think at the next status hearing, if discovery is substantially complete, I will set some deadlines for making additional discovery requests, but I'm not going to do that now. So I will not set a pretrial motion schedule at this time and perhaps, depending on people's progress in making their way through the discovery and the Government's giving over all the discovery, perhaps it will be appropriate for everyone to provide a proposed briefing schedule when you file your next status conference report prior to the interim status conference.

With Mr. Schumacher's agreement, I will request the resolution of the motion to dismiss be stayed as requested, and I'm going to suspend the Government's deadline for responding.

MR. SCHUMACHER: Thank you, Your Honor.

THE COURT: Okay. That was Mr. Schumacher saying -- okay.

CERTIFICATE OF OFFICIAL REPORTER I, Linda Walsh, Registered Professional Reporter and Certified Realtime Reporter, in and for the United States District Court for the District of Massachusetts, do hereby certify that the foregoing transcript is a true and correct transcript of the stenographically reported proceedings held in the above-entitled matter to the best of my skill and ability. Dated this 5th day of June, 2019. /s/ Linda Walsh Linda Walsh, RPR, CRR Official Court Reporter

Exhibit LLL

1	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS		
2	FOR THE DISTRICT OF MASSACHUSETTS		
3	UNITED STATES OF AMERICA,)		
4	Plaintiff,)		
5	v.)		
6	DAVID SIDOO, GREGORY COLBURN,) AMY COLBURN, GAMAL ABDELAZIZ,)		
7	DIANE BLAKE, TODD BLAKE,) Criminal Action I-HSIN CHEN, MOSSIMO GIANNULLI,) Nos. 1:19-cr-10080-NMG		
8	ELIZABETH HENRIQUEZ,) MANUEL HENRIQUEZ, DOUGLAS HODGE,)		
9	MICHELLE JANAVS, ELISABETH) KIMMEL, LORI LOUGHLIN, WILLIAM)		
10	MCGLASHAN, JR., MARCI PALATELLA,) JOHN WILSON, HOMAYOUN ZADEH,)		
11	ROBERT ZANGRILLO,)		
12	Defendants.)		
13			
14	BEFORE THE HONORABLE M. PAGE KELLEY UNITED STATES MAGISTRATE JUDGE		
15			
16	INTERIM STATUS CONFERENCE		
17	October 2, 2019		
18			
19	John J. Moakley United States Courthouse Courtroom No. 24		
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speaking with Judge Gorton, two things: Judge Gorton has a strong preference that the case be tried in 2020. So just to give you some idea of the schedule that he has in mind, he would like the trial or trials to be in the coming year.

And, secondly, like Judge Talwani, he is amenable to the defendants filing a dispositive motion on the scope of the conspiracy prior to the filing of other dispositive motions, and what I think we'll do is give defendants time to digest the discovery sufficiently so that you feel that you can file such a motion, but then we'll go ahead and file the motions, get them up to him, and he will rule on those before the case goes up for trial.

So -- and another thing you should just be thinking about, which this may be somewhat premature, is for those who are going to trial, whether such a motion is allowed or not, there will probably not be only one trial. So you might just want to be thinking in your planning for the case about the grouping of the defendants for trial.

Okay. So with that having been said, I think I'll hear from the Government concerning the status of the production of discovery.

MR. ROSEN: Judge, I think we've made a lot of progress in terms of producing discovery. The last production was at the end of August. We're continuing to make productions. We're at a very sort of limited -- the amounts

have been getting, you know, much smaller since the initial tranche. You know, we do anticipate producing limited amounts more. We did a series of search warrants back in July. We're currently processing this evidence and working with the defendants on privilege and things like that, and we anticipate having it done in the next two months. I do note that, though, you know, given that it was defendants' own e-mail accounts for the parents, that they do have access to what we have seized. So there shouldn't be any surprises for them, at least within that discovery.

We've produced about two million documents, I think just under two million documents thus far, and we've had continued discussions with multiple defense counsel. I know I received a general discovery letter from the defendants next -- last -- earlier this week, or I think at the end of last week. And, you know, we'll respond sort of in due course.

I did meet with counsel for Mr. McGlashan just before this meeting. We did have, I think, a very productive meeting, and I do think it's helpful when, you know, going through these discovery exercises that counsel at least set up a time so we can meet together and discuss, meet and confer in person, as it, I think, can alleviate a lot of issues in the sort of back-and-forth communication amongst the parties.

Pursuant to our meeting, I said we would respond to the various things we agreed upon, and we will do that in due

course, hopefully fairly soon.

So that's about it from my perspective. I don't know if the Court has any additional questions on that?

THE COURT: So with regard to the e-mail accounts that were seized, do the defendants -- the affected defendants know precisely what was seized?

MR. ROSEN: Well, they should know that their e-mail address -- that their e-mail address was seized by the Government because we've produced the affidavit and everything in discovery.

THE COURT: Okay.

MR. ROSEN: They actually get notice from the service provider where there's no nondisclosure order, and we have since been reached out to every defendant who this has affected, and we have gotten from them a list of potential privileged e-mail addresses, and we sort of wiped all those away from any type of review or anything like that to avoid any type of privileged review, and then we're -- we have contractors that are beginning to sort through the nonprivileged e-mails to comply with Attachment B, which is what we're trying to do now, just to make sure we only turn over and retain stuff related to the criminal activity.

THE COURT: Okay. So thank you. And anything from defense counsel concerning the issue of discovery? Yes?

MR. WEINBERG: No criticisms of discovery, but just an

alert, if I can, you know, that we would request that all of the deadlines that the Government has proposed be deferred for discussion on January 17. I think I speak for defense counsel to say that although we appreciate Judge Gorton's, you know, receiving, you know, some takeout motions or motions that comprehensively challenge the cornerstones of the Government's theory of prosecution and whether or not facially they charge properly the different criminal statutes that they've alleged, we'd like Your Honor to set a date on January 17 for the filing of that motion as well as the filing of discovery motions.

I have told Mr. Rosen we'll try to get letters to the Government about open discovery issues before the January 17 status conference so that we can at least identify for the court on that date, you know, what issues remain between the defense, you know, counsel and the Government.

But the search warrants are quite important because they were our clients' own statements by e-mail, and I'd like to, you know, work with the Government. Perhaps if they would give us their search terms, then we can do the same search terms on our clients' e-mails because otherwise we're dealing with just dozens of thousands of e-mails, and to review our clients' e-mails if the Government is only going to search and download a subset, along with all of the other responsibilities, with over 2,000 audios and that three million pages of discovery, make it hard even by January 17th for us to

finish the first-level job of reviewing the whole universe of 1 materials that the Government has provided us in their rolling 2 3 discovery. THE COURT: Okay. So stop right there. You can still 4 5 talk but -- so does anyone have a problem, any of the defendants, with filing the motion concerning the conspiracy by 7 January 17th or does anyone feel that that's too far in the 8 future? 9 DEFENSE COUNSEL: Your Honor, I think I may be wrong, 10 but I thought he suggested not setting a date for the motion to 11 be filed January 17th. MR. WEINBERG: That's right. What I would ask Your 12 13 Honor --14 THE COURT: Oh, until the 17th. I see. MR. WEINBERG: Give us to the 17th to continue --15 we've only had literally four and a half months to go through 16 three million pages of materials and thousands of audios. Give 17 18 us to January 17th so that when we make our challenges that 19 Judge Gorton is inviting, you know, we'll make them shortly 20 after the 17th. Your Honor will set a date for the pleadings 21 that will not jeopardize the desire to have the trials, in the 22 plural, occur in the last part of 2020. 23 THE COURT: So I'm kind of fascinated that, you know, 24 we had another group in yesterday who want to file that motion 25 this month because they're -- I think what counsel stated, it's

not dependent on discovery. So -- which seemed like a curious thing to me, but okay. But you say it is dependent on the discovery, so you would like to review the millions of pages of discovery in the next three months and then set a date for filing the motion concerning the conspiracy?

MR. WEINBERG: And here's why, Judge. You know, there's two levels of challenge to the Government's theory of prosecution. You know, one is strictly facial, and we all know that with the Government not stipulating to facts, the courts are disinclined to dismiss indictments if there's any hypothetical factual scenario that would legitimize the Government's pleading. They take the pleading at face value, and if the Government says fraud or bribery or property crime or obtaining money, it ordinarily survives the facial challenge, and they've charged a single conspiracy, or at least they've attempted to.

What we're trying to do, or at least I'm trying to do, is represent in a pleading that goes one level below the facial allegations that there's simply no evidence that, for instance, my client knows this gentlemen's client or any of our clients know each other. It is the absolute classic, going back to the old drug cases, you know, I started with in the 1970s, you have a hub, Mr. Singer; you have spokes, the parents; and you have an absolute absence of evidence of a rim, a rim being defined as interdependence. But I can't -- I can make that argument

better if I could represent that I have examined the evidence and the interdependence of Mr. Zangrillo and any of the other co-counsel's clients doesn't exist, and if they can do the same with me, hopefully the Government will at least agree to that level of fact. And they will argue, well, we have Singer and Singer's team, and that's enough to make everybody a single conspiracy, and then we can present to Judge Gorton a motion that can't be simply adjudged on the face of it, which has problems, but we can really address to Judge Gorton in this first pleading a pleading that will raise the issues that are of pivotal significance to all of us as we go forward.

THE COURT: Okay. So I don't know what your view is, Mr. Rosen?

MR. ROSEN: My view is that there's, you know, there's no summary judgment motions in criminal practice. It would just simply be a jury issue. So I don't think it's relevant to -- I don't think it's relevant to look beneath the facts, especially when they're skewed in a particular direction. I'm not going to address that now, Judge, but I'm happy with the January date or whatever. We don't need that, that's fine. Whether the motion improperly incorporates facts that cherry-pick from discovery, that's another issue that Judge Gorton will deal with.

THE COURT: Okay. So I will not set a date for the filing of that particular motion until January 17th. But it

would be very helpful if on the 17th counsel have some idea of by what date they want to file the motion, and if you could work on a date together. And if you have an outlier, you could -- and you're filing a separate motion, you could just propose your separate dates.

I do think it's in your interest to consolidate as much as possible, although I know it may not be possible for everyone. And also on the 17th, absent some really good reasons, I think those dates will be set in fairly short order. I wouldn't expect more than 45 to 60 days to file those motions by then, although I'll hear you on that.

So, okay, so what about -- I guess the Government was asking for a briefing schedule for discovery motions, and I think I won't do that at this time, but I would really urge counsel, as you are going through the discovery, to send letters to the Government periodically and not hold off until you have all your discovery requests at once, because I do think on the 17th we will also shorten up those dates, and you'll need to have reviewed the discovery. I know it's very voluminous, but if you're going to go to trial soon after that, you're going to need to have reviewed it. So you need to have reviewed the discovery and know what it is that you want from the Government, and we'll set dates at that time, too, to try to get you to a motions date, if you need one.

So I'm not going -- I'm not going to enforce a strict

deadline for the letters, but let's get them rolling so the Government isn't deluged with them at the end. And I don't want to see that as a tactic either. So when things occur to you, send them a letter.

Yes, sir?

MR. HUESTON: John Hueston on behalf of William McGlashan. So the letters have been coming. There's been one that's been sent collectively and then there has been some individual letters and there has been some meet and conferring happening along those lines.

I guess what I want to prepare Your Honor for is I think the Government has been working, from my perspective, in good faith to try to resolve issues, but as of today, a Brady review is not complete, they've acknowledged. It's not just a matter of getting out a couple of final productions, and there's going to be additional meet and confers necessary. And then we're going to be relying on them producing the remainder of discovery far enough in advance of that January 17th hearing so that everything is teed up and we can then have a better sense of how we can actually schedule any necessary discovery motions.

So my point being, maybe an urging of the Government to complete its process both in meeting with us, and we have not let grass grow under our feet. There's no tactic here.

There are millions of pages of documents. People are working

CERTIFICATE OF OFFICIAL REPORTER I, Linda Walsh, Registered Professional Reporter and Certified Realtime Reporter, in and for the United States District Court for the District of Massachusetts, do hereby certify that the foregoing transcript is a true and correct transcript of the stenographically reported proceedings held in the above-entitled matter to the best of my skill and ability. Dated this 6th day of October, 2019. /s/ Linda Walsh Linda Walsh, RPR, CRR Official Court Reporter

Exhibit MMM

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff

vs.

Case No. 1:19-cr-10080-NMG

DAVID SIDOO ET AL, Defendants

TRANSCRIPT OF INTERIM STATUS CONFERENCE
BEFORE THE HONORABLE M. PAGE KELLEY
AT BOSTON, MASSACHUSETTS
ON JANUARY 17, 2020

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1 PROCEEDINGS 2

- 3 THE CLERK: Today is Friday, January 17, 2020, and we
- 4 are on the record in Criminal Case No. 19-10080, the United
- 5 States versus David Sidoo et al, the Honorable M. Page Kelley
- 6 presiding.
- 7 Would counsel please identify themselves for the
- 8 record.
- 9 MR. ROSEN: Good morning, your Honor. Eric Rosen,
- 10 Kristen Kearney, Leslie Wright and Justin O'Connell for the
- 11 Government.
- 12 THE COURT: Good morning.
- 13 MR. WEINBERG: Good morning, your Honor. Martin
- 14 Weinberg on behalf of both David Sidoo and Robert Zangrillo.
- 15 THE COURT: Good morning.
- MR. HUESTON: Good morning, your Honor. John Hueston
- on behalf of William McGlashan.
- 18 MR. POPEO: Good morning, your Honor. Robert Popeo on
- behalf of Elisabeth Kimmel, and I'm here with Corey Flashner
- 20 and Eoin Beirne.
- 21 THE COURT: Okay. Good morning to everyone.
- 22 MS. MINER: Good morning, your Honor. Tracy Miner for
- 23 Homayoun Zadeh.
- MR. KELLY: Good morning, your Honor. Brian Kelly and
- Josh Sharp on behalf of Mr. Gamal Abdelaziz.

- 1 THE COURT: Good morning.
- 2 MR. BERKOWITZ: Good morning, your Honor. Sean
- 3 Berkowitz on behalf of Lori Loughlin and Mossimo Giannulli.
- 4 THE COURT: Good morning.
- 5 MR. PIROZZOLO: Good morning, your Honor. Jack
- 6 Pirozzolo on behalf of Bill McGlashan.
- 7 MR. VIEN: Good afternoon, your Honor. George Vien on
- 8 behalf of Mossimo Giannulli.
- 9 MS. BASSIL: Good morning, your Honor. Janice Bassil
- 10 standing in for Ruben Cahn for I-Hsin Chen.
- 11 THE COURT: Okay.
- MR. ROBINSON: Mark Robinson, Mintz Levin, for
- 13 Elisabeth Kimmel.
- 14 THE COURT: Good morning.
- 15 MR. KENDALL: Good morning, your Honor. Mike Kendall
- 16 and Yakov Malkiel for John Wilson.
- 17 MR. SCHUMACHER: Good morning, your Honor. David
- 18 Schumacher on behalf of Amy and Gregory Colburn.
- 19 THE COURT: Good morning.
- 20 MR. LOUCKS: Good morning. Mike Loucks for Marci
- 21 Palatella.
- THE COURT: Good morning.
- Okay, that's everyone. That's enough.
- So I have a few housekeeping matters and then I'm
- 25 going to go over the Joint Status Report that the parties

- confer on a date. I'm going to exclude the time between now and the next date under the Speedy Trial Act.
- 3 So what else can I do for you?
- Wow, no one has any complaint?

22

23

5 MR. WEINBERG: I guess I would say one thing. I think 6 it's probably more a subject for a later status conference or even more a status conference with Judge Gorton, but we have 7 8 received an enormous amount of discovery. It's almost unquantifiable between the audio tapes, the document discovery, 9 10 the e-mail discovery, the discovery that comes in from third 11 parties. We received on January 9 another rather significant production of both new and old discovery, and we will be asking 12 13 the Court to consider requiring the Government to file a real 14 exhibit list well before any trial is scheduled by Judge 15 Gorton. It's simply impossible for us to put our hands around, you know, literally millions of e-mails, millions of documents, 16 thousands of audios, and prepare a meaningful targeted defense 17 18 without the Government being required at a time that's more in 19 advance than usual in a narrower case with less discovery. We 20 simply need to know what the Government is choosing from this,

So we will be asking the Court at the May conference to consider asking the Government, whether it's 90 days or 120

trial and a manageable multi-defendant trial.

you know, I hate to say millions of pages of discovery, so that

we can respond and target our defenses, and have a manageable

- days before trial, to be required to give us their exhibit
- 2 list. Obviously, it's not fixed in stone if they change
- 3 strategies. They could supplement the list. But at least we
- 4 can begin to zero in on the documents, e-mails and audios that
- 5 we need to master to be able to crystalize a defense to give
- 6 them responsive discovery that is not their discovery, but our
- discovery, and will they prepare for a streamline trial that's
- 8 not, you know, completely chaotic.
- 9 THE COURT: Okay. Mr. Rosen, do you want to respond
- 10 to that?
- 11 MR. ROSEN: I mean, Judge, we will of course provide
- 12 an exhibit list, you know, prior to trial. We obviously change
- 13 the exhibits significantly as you approach trial, figure out
- 14 who is pleading guilty, who is not pleading guilty, who is
- 15 going forward and we streamline our case. I think 90 or 120
- days would be impossible to do, but we're open to a resolution,
- 17 provided that the defendants of course provide reciprocity to
- 18 that in their own exhibit list and we get some -- we get what
- we believe is deserved to us as well, including the Rule 16(b)
- 20 reciprocal discovery.
- 21 So we're hoping to a resolution. I think we can work
- 22 together with the parties to come up with a date for an exhibit
- list, but I do want it to be reciprocal.
- 24 THE COURT: Okay. So I'll just table that for now and
- 25 it seems like there's some room for the parties to negotiate

<u>CERTIFICATION</u>

I, Karen M. Aveyard, Approved Federal Court

Transcriber, do hereby certify that the foregoing transcript,

consisting of 20 pages, is a correct transcript prepared to the

best of my skill, knowledge and ability from the official

digital sound recording of the proceedings in the

above-entitled matter.

/s/ Karen M. Aveyard

Karen M. Aveyard

February 9, 2020

Date

Exhibit NNN

1	IN THE UNITED STATES DISTRICT COURT		
2	FOR THE DISTRICT OF MASSACHUSETTS		
3			
4	* * * * * * * * * * * * * * 19CR10080-NMG		
5	UNITED STATES OF AMERICA*		
6	VS. * SEPTEMBER 18, 2019 * 2:23 P.M.		
7	ROBERT ZANGRILLO * *		
8	* * * * * * * * * * * * BOSTON, MA		
9			
10	BEFORE THE HONORABLE M. PAGE KELLEY		
11	MAGISTRATE JUDGE		
12	(Motion Hearing)		
13			
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18 SEPTEMBER 2019 -- 2:23 P.M.

THE CLERK: Today is Wednesday, September 18th, 2019, and we are on the record in Criminal Case No. 19-10080, the United States v. Robert Zangrillo, the Honorable M. Page Kelley presiding.

Will counsel please identify themselves for record.

MR. FUCHS: Yes. Good afternoon, Your Honor.

Doug Fuchs from Gibson, Dunn & Crutcher on behalf of third party University of Southern California. And with me at counsel table is Anthony Fuller who I'm sure you know well.

THE COURT: Yes. Good afternoon.

MR. WEINBERG: Good afternoon, Your Honor.

Martin Weinberg with Michael Pabian who filed a notice of appearance today as my co-counsel on behalf of Defendant, Robert Zangrillo.

THE COURT: Okay. And good afternoon to you.

We're starting a few minutes early, but I was just standing out there and you're just sitting in here, so I thought we might as well get going.

So I did ask the Government to join us because I noticed in the pleadings there are some representations about the Government's position on certain matters, and I didn't know if we might want them to chime in or not.

So that's why they're sitting there.

So we're here for oral argument on No. 532 on the docket, which is USC's motion to quash Defendant Zangrillo's subpoena. And this matter has its origins in No. 432, which was Defendant Zangrillo's motion for a Rule 17(c) subpoena. That was filed under seal, but I think it was subsequently unsealed, at least some -- I think it's still redacted, parts of it, on the docket in which Defendant set out parts of his defense, but that should be on the docket now. So I allowed that motion, and USC moved to quash, and then the parties have filed several responsive and opposing pleadings since that time.

And one thing I want to make clear before I hear argument is that I allowed the Defendant's motion for a subpoena, but I did so with the understanding that USC would have the opportunity to confer with Mr. Weinberg and to file a motion to quash if they were not able to reach an agreement, and both of those things were obviously done. So that's why we're here. But I don't think there is a presumption that, because I originally allowed the subpoena, that I'm not open to USC's arguments. There was some suggestion of that I think in the pleadings.

So okay. I think I would first really like to

nothing to do with their case, as charged.

MR. ROSEN: I'll be brief. I know we want to get out of here.

Judge, Mr. Fuchs is exactly right. The VIP process has absolutely nothing to do with this case because he's been charged with conspiracy to commit wire fraud and mail fraud, and that relies solely on his intent and his good faith. He had no -- Mr. Zangrillo had no idea at all his daughter, Amber Zangrillo, was getting tagged as a VIP applicant.

The only thing that he believed was that there was phony crew credentials being made up and put on the application, and by the way, that's on the application. The very first activity is that Amber Zangrillo spent 44 hours a week doing crew at the LA Rowing Club, which is patently false. And then he was never told at all during the case that Amber Zangrillo was admitted as a VIP or anything like that or a special interest.

I think -- and we haven't heard any evidence to the contrary -- that the only time Mr. Zangrillo actually learned about that was after his arrest when he figured it out, and now he's trying to back-door and cobble together a defense of good faith based on information and emails he was not on, he had no

knowledge of, and there's nothing showing any communications between himself, Rick Singer,

Donna Heinel or anyone else showing that this is how he thought she was going to get in.

There's been a lot of time spent on the USC admissions process and everything like that. There's been no time spent on his state of mind. All we've seen is one email or one document that's been provided solely to the Court, not to the Government, despite our request for Rule 16(b) discovery, that they claim he was aware, aware generally of the VIP process, nothing to say he was aware of it in the context of Amber Zangrillo's admission.

The entirety of Amber Zangrillo's admission was a complete fraud. There were classes that Mr. Zangrillo was paying Michaela Sanford from The Key Worldwide to take and then put and submit it to USC so that she could go to Europe. He wanted Rick Singer to fix an F.

Mr. Weinberg brought up about how some parents were brought in kicking and screaming into this. Not Mr. Zangrillo. Mr. Zangrillo encouraged, aided, abetted and paid for that fraud on multiple, multiple occasions. Even after he was admitted into -- even after Ms. Amber Zangrillo was admitted into USC,

Mr. Zangrillo, in an October 25th, 2018, call admitted he had no idea why the \$200,000 payment to KWF, The Key Worldwide Foundation was made. He said -- he's asking Rick to come up with a story for why that payment was made. He says, "Rick, what was the Amber payment for, just so I know we have the story straight?"

This isn't a guy acting in good faith about the VIP program; he's getting his story straight to lie to the IRS about the \$200,000 funneled through the -- for the charity. They talked about the \$50,000 to USC. What about the \$200,000 that he paid out to Rick Singer? Where was that going? We'd have to believe that USC, one of the largest research institutions on the planet, set up some secret agreement with Rick Singer and his fake charity to funnel donations through that charity that served underserved kids in order to legitimize anything good faith about Zangrillo's actions.

It's ridiculous. This is a complete side show, completely unrelated to the issues at hand, and we intend fully, if any of the documents are gotten, to file a motion in limine to admit.

The sole question is: Did Mr. Zangrillo know about that? And there's been -- know about this process of getting in? And there's been absolutely no

CERTIFICATION I, Debra D. Lajoie, RPR-FCRR-CRI-RMR, do hereby certify that the foregoing pages are a true and accurate transcription of my stenographic notes in the above-entitled case. /s/ Debra D. Lajoie 9/23/19